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7
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
9 STATE OF CALIFORNIA

10 In the Matter of)	FPPC Case No.: 2024-00501
)	
11 JESSE HUANG,)	DEFAULT DECISION AND
12)	ORDER
13 Respondent.)	(Government Code Sections 11506
14)	and 11520)
15)	

16 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
17 submits this Default Decision and Order for consideration by the Fair Political Practices Commission at
18 its next regularly scheduled meeting.

19 Pursuant to the California Administrative Procedure Act,¹ Jesse Huang (“Huang”) has been
20 served with all of the documents necessary to conduct an administrative hearing regarding the above-
21 captioned matter, including the following:

- 22 1. An Order Finding Probable Cause;
- 23 2. An Accusation;
- 24 3. A Notice of Defense (Two Copies per Respondent);
- 25 4. A Statement to Respondent; and
- 26 5. Copies of Sections 11506, 11507.5, 11507.6 and 11507.7 of the Government Code.

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28 ¹ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code.

1 Government Code Section 11506 provides that failure of a respondent to file a Notice of
2 Defense within fifteen days after being served with an Accusation shall constitute a waiver of the
3 respondent's right to a hearing on the merits of the Accusation. The Statement to Respondent served on
4 Huang stated that a Notice of Defense must be filed in order to request a hearing. Huang failed to file a
5 Notice of Defense within fifteen days of being served with an Accusation. Government Code Section
6 11520 provides that if the respondent fails to file a Notice of Defense, the Commission may take action,
7 by way of a default, based upon the respondent's express admissions or upon other evidence and that
8 affidavits may be used as evidence without any notice to the respondent.

9 Huang violated the Political Reform Act as described in Exhibit 1, which is attached hereto and
10 incorporated by reference as though fully set forth herein. Exhibit 1 is a true and accurate summary of
11 the law and evidence in this matter. This Default Decision and Order is submitted to the Commission to
12 obtain a final disposition of this matter.

13
14 Dated: _____

Kendall L.D. Bonebrake, Chief of Enforcement
Fair Political Practices Commission

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17
18 **ORDER**

19 The Commission issues this Default Decision and Order and imposes a total administrative
20 penalty of \$15,000 upon Jesse Huang, payable to the "General Fund of the State of California."

21 IT IS SO ORDERED, effective upon execution below by the Chair of the Fair Political
22 Practices Commission at Sacramento, California.

23
24 Dated: _____

Adam Silver, Chair
Fair Political Practices Commission

EXHIBIT 1

INTRODUCTION

Respondent, Jesse Huang (“Huang”), has been a Recreation Coordinator for the City of Los Angeles Department of Recreation and Parks (“Rec and Parks”) since January 2, 2001. On April 22, 2020, the position of Recreation Coordinator was added as a designated position to the Rec and Parks’ Conflict of Interest Code. As such, Huang is considered to have assumed the position of Recreation Coordinator along with its corresponding filing obligations on April 22, 2020.

The Political Reform Act (the “Act”)¹ requires designated employees to disclose their reportable economic interests on a Statement of Economic Interests (“SEI”) at various times pursuant to their agency’s Conflict of Interest Code.

This matter stemmed from a filing officer referral from the Los Angeles City Ethics Commission (“Filing Officer”).

Huang, a designated employee, violated the Act by failing to timely file an Assuming Office SEI by the May 22, 2020 due date, a 2020 Annual SEI by the April 1, 2021 due date, a 2021 Annual SEI by the April 1, 2022 due date, a 2022 Annual SEI by the April 3, 2023 due date, and a 2023 Annual SEI by the April 2, 2024 due date.

DEFAULT PROCEEDINGS UNDER THE ADMINISTRATIVE PROCEDURE ACT

When the Commission determines that there is probable cause for believing that the Act has been violated, it may hold a hearing to determine if a violation has occurred.² Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure Act (the “APA”).³ A hearing to determine whether the Act has been violated is initiated by the filing of an accusation, which shall be a concise written statement of the charges, specifying the statutes and rules which the respondent is alleged to have violated.⁴

Included among the rights afforded a respondent under the APA, is the right to file the Notice of Defense with the Commission within 15 days after service of the accusation, by which the respondent may (1) request a hearing; (2) object to the accusation on the ground it does not state acts or omissions upon which the agency may proceed; (3) object to the form of the accusation on the ground that it is so indefinite or uncertain that the respondent cannot identify

¹ The Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission (“Commission”) are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

² Section 83116.

³ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

⁴ Section 11503.

the transaction or prepare a defense; (4) admit the accusation in whole or in part; (5) present new matter by way of a defense; or (6) object to the accusation on the ground that, under the circumstances, compliance with a Commission regulation would result in a material violation of another department's regulation affecting substantive rights.⁵

The APA provides that a respondent's failure to file a Notice of Defense within 15 days after service of an accusation constitutes a waiver of the respondent's right to a hearing.⁶ Moreover, when a respondent fails to file a Notice of Defense, the Commission may take action based on the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to the respondent.⁷

PROCEDURAL REQUIREMENTS AND HISTORY

A. Initiation of the Administrative Action

The service of the probable cause hearing notice, as required by Section 83115.5, upon the person alleged to have violated starts the administrative action.⁸

A finding of probable cause may not be made by the Commission unless the person alleged to have violated the Act is 1) notified of the violation by service of process or registered mail with return receipt requested; 2) provided with a summary of the evidence; and 3) informed of his or her right to be present in person and represented by counsel at any proceeding of the Commission held for the purpose of considering whether probable cause exists for believing the person violated the Act.⁹ Additionally, the required notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office.¹⁰

No administrative action pursuant to Chapter 3 of the Act alleging a violation of any of the provisions of the Act may be commenced more than five years after the date on which the violation occurred.¹¹

Documents supporting the procedural history are included in the attached Certification of Records ("Certification") filed herewith as Exhibit 1, A-1 through A-6, and A-13 through A-14, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against Huang in this matter by serving them with a Report in Support of a Finding of Probable Cause (the "Report") by certified mail.¹² (Certification, Exhibit A-1.) Since

⁵ Section 11506, subd. (a)(1)–(6).

⁶ Section 11506, subd. (c).

⁷ Section 11520, subd. (a).

⁸ Section 91000.5, subd. (a).

⁹ Section 83115.5.

¹⁰ Section 83115.5.

¹¹ Section 91000.5.

¹² Section 83115.5.

the registered mail receipt was not signed, service was deemed effective on March 12, 2025, the date the Report was returned by the post office.¹³ (Certification, Exhibit A-2.) The administrative action commenced on March 12, 2025, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on Huang contained a cover letter and a memorandum describing probable cause proceedings, advising that they had 21 days in which to request a probable cause conference and/or to file a written response to the Report. Huang did not request a probable cause conference or submit a written response to the Report.

B. Ex Parte Request for a Finding of Probable Cause

Because Huang failed to request a probable cause conference or submit a written response to the Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on April 10, 2025. (Certification, Exhibit A-3.)

On April 11, 2025, the Hearing Officer, Legal Division, John Feser, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Huang. (Certification, Exhibit A-4.)

C. The Issuance and Service of the Accusation

Under the Act, if the Hearing Officer makes a finding of probable cause, the Enforcement Division must prepare an accusation pursuant to Section 11503 of the APA, and have it served on the persons who are the subject of the probable cause finding.¹⁴

Section 11503 states:

A hearing to determine whether a right, authority, license, or privilege should be revoked, suspended, limited, or conditioned shall be initiated by filing an accusation or District Statement of Reduction in Force. The accusation or District Statement of Reduction in Force shall be a written statement of charges that shall set forth in ordinary and concise language the acts or omissions with which the respondent is charged, to the end that the respondent will be able to prepare his or her defense. It shall specify the statutes and rules that the respondent is alleged to have violated but shall not consist merely of charges phrased in the language of those statutes and rules. The accusation or District Statement of Reduction in Force shall be verified unless made by a public officer acting in his or her official capacity or by an employee of the agency before which the proceeding is to be held. The verification may be on information and belief.

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¹³ *Id.*

¹⁴ Regulation 18361.4, subd. (g).

Upon the filing of the accusation, the agency must 1) serve a copy thereof on the respondent as provided in Section 11505, subdivision (c); 2) include a post card or other form entitled Notice of Defense that, when signed by or on behalf of the respondent and returned to the agency, will acknowledge service of the accusation and constitute a notice of defense under Section 11506; 3) include (i) a statement that respondent may request a hearing by filing a notice of defense as provided in Section 11506 within 15 days after service upon the respondent of the accusation, and that failure to do so will constitute a waiver of the respondent's right to a hearing, and (ii) copies of Sections 11507.5, 11507.6, and 11507.7.¹⁵ The APA also sets forth the language required in the accompanying statement to the respondent.¹⁶

The Accusation and accompanying information may be sent to the respondent by any means selected by the agency, but no order adversely affecting the rights of the respondent may be made by the agency in any case unless the respondent has been served personally or by registered mail as set forth in the APA.¹⁷

On June 9, 2025, the Commission's Assistant Chief of Enforcement, Angela J. Brereton, issued an Accusation against Huang. (Certification, Exhibit A-5.) In accordance with Section 11505, the Accusation and accompanying information, consisting of a Statement to Respondent, two copies of a Notice of Defense Form for each respondent, copies of Government Code Sections 11506, 11507.5, 11507.6, and 11507.7, were served upon Huang by substituted service, pursuant to California Code Civil Procedure Section 415.20, subdivision (a), which was deemed complete on August 17, 2025. (Certification, Exhibit A-6.)

Along with the Accusation, the Enforcement Division served Huang with a "Statement to Respondent," which notified them that they could request a hearing on the merits and warned that, unless a Notice of Defense was filed within 15 days of service of the Accusation, they would be deemed to have waived the right to a hearing. Huang did not file a Notice of Defense within the statutory time period, which ended on September 2, 2025.¹⁸

As a result, on December 30, 2025, the Enforcement Division sent a letter to Huang advising that this matter would be submitted for a Default Decision and Order at the Commission's public meeting scheduled for February 12, 2026. (Certification, Exhibit A-13.)

On February 3, 2026, the Enforcement Division sent another letter to Huang advising that this matter would be submitted for a Default Decision and Order at the Commission's public meeting scheduled for March 19, 2026. (Certification, Exhibit A-14.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

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¹⁵ Section 11505, subd. (a).

¹⁶ Section 11505, subd. (b).

¹⁷ Section 11505, subd. (c).

¹⁸ The fifteenth day after August 17, 2025 was September 1, 2025. Labor Day was observed on September 1, 2025, so the due date for Huang's response to the Accusation was on the next business day, September 2, 2025.

SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred between 2020 and 2024. For this reason, all legal references and discussions of law pertain to the Act's provisions as they existed at that time.

An express purpose of the Act is to promote transparency by ensuring that assets and income of public officials which may be materially affected by their official actions be disclosed so that conflicts of interests may be avoided.¹⁹ Another purpose is to provide adequate enforcement mechanisms so that the Act will be "vigorously enforced."²⁰

The Act requires every state and local agency to develop a Conflict of Interest Code.²¹ These codes must designate those officials who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that official and require those designated officials to disclose all reportable interests on SEIs.²² The requirements of an agency's Conflict of Interest Code have the force of law, and any violations of those requirements is deemed a violation of the Act.²³

Regulation 18730 outlines the timing for disclosing the designated employees' economic interests as follows: all employees in a position that becomes designated by an amendment to the Conflict of Interest Code shall file an assuming office statement within 30 days after the effective date of the amendment that designated the position,²⁴ all designated employees shall annually file statements no later than April 1,²⁵ and all persons leaving designated positions shall file statements within 30 days after leaving the designated positions.²⁶ If the filing deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for the statement shall be extended to the next regular business day.²⁷ Any person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per violation.²⁸

The Conflict of Interest Code for the Rec and Parks added Recreation Coordinator as a designated position on April 22, 2020 and required Recreation Coordinators to disclose all investments, business positions and sources of income from any source, individual or business entity who provides or has sought to provide services, goods, or equipment to the Recreation Coordinator's division; who has been a party to or sought to become a party to a written agreement with the Recreation Coordinator's division; or for whom the Recreation Coordinator's division has provided a review, recommendation, or referral. Recreation Coordinators are also required to disclose all interests in real property involved in an enforcement, regulatory,

¹⁹ Section 81002, subd. (c).

²⁰ Section 81002, subd. (f).

²¹ Section 87300.

²² Section 87302, subd. (a).

²³ Section 87300.

²⁴ Regulation 18730, subd. (b)(5)(A).

²⁵ Regulation 18730, subd. (b)(5)(C).

²⁶ Regulation 18730, subd. (b)(5)(D).

²⁷ Section 81005.

²⁸ Section 83116 and 83116.5.

legislative, permitting, licensing, or contractual decision made or pending by the Recreation Coordinator's division. Additionally, the Conflict of Interest Code states: "The definitions for investments, business positions, sources of income, interests in real property, doing business, gifts, and other terms may be found in the California Political Reform Act, its associated regulations, and the instructions for the California Form 700."

SUMMARY OF THE EVIDENCE

Documents supporting the summary of the evidence are included in the attached Certification of Records ("Certification") filed herewith as Certified, Exhibit 1, A-7 through A-12 and incorporated herein by reference.

Huang has been a Recreation Coordinator for the Rec and Parks since January 2, 2001. The position of Recreation Coordinator was added as a designated position to the City of Los Angeles Department of Recreation and Parks' Conflict of Interest Code beginning on April 22, 2020. As such, Huang is considered to have assumed the position of Recreation Coordinator along with its corresponding filing obligations on April 22, 2020.

Huang was required to timely file the Assuming Office SEI by the May 22, 2020 due date. After receiving contact from the Enforcement Division, Huang filed the Assuming Office SEI on April 30, 2025. (Certification, Exhibit A-7.)

Huang was required to timely file the 2020 Annual SEI by the April 1, 2021 due date.

The Filing Officer made multiple attempts to notify Huang of their duty to file the 2020 Annual SEI. Between February 25, 2021 and July 7, 2021, the Filing Officer notified Huang at least five times via email of the obligation to file. (Certification, Exhibit A-8.) After not receiving compliance from Huang, the Filing Officer referred the matter to the Commission's Enforcement Division on December 21, 2021. After receiving contact from the Enforcement Division, Huang filed the 2020 Annual SEI on April 30, 2025. (Certification, Exhibit A-9.)

Huang was required to timely file the 2021 Annual SEI by the April 1, 2022 due date. After receiving contact from the Enforcement Division, Huang filed the 2021 Annual SEI on April 30, 2025. (Certification, Exhibit A-10.)

Huang was required to timely file the 2022 Annual SEI by the April 3, 2023 due date. After receiving contact from the Enforcement Division, Huang filed the 2022 Annual SEI on April 30, 2025. (Certification, Exhibit A-11.)

Huang was required to timely file the 2023 Annual SEI by the April 2, 2024 due date. After receiving contact from the Enforcement Division, Huang filed the 2023 Annual SEI on April 30, 2025. (Certification, Exhibit A-12.)

Huang has since filed all outstanding SEIs.

Relevant to this Default, Huang failed to timely file the following SEIs:

Type of SEI	Due Date	Date Filed
Assuming Office	5/22/2020	4/30/2025
2020 Annual	4/1/2021	4/30/2025
2021 Annual	4/1/2022	4/30/2025
2022 Annual	4/3/2023	4/30/2025
2023 Annual	4/2/2024	4/30/2025

Summary of Contact

Overall, the Commission contacted Huang fifteen times throughout this case, as follows:

- April 30, 2024: email from Enforcement Division regarding outstanding SEIs
- May 8, 2024: call from Commission staff, no answer, left voicemail
- July 31, 2024: email from Enforcement Division regarding outstanding SEIs
- August 27, 2024: email from Enforcement Division regarding outstanding SEIs
- September 18, 2024: email from Enforcement Division regarding outstanding SEIs
- September 23, 2024: email from Enforcement Division regarding outstanding SEIs
- September 27, 2024: call from Enforcement Division, no answer, left voicemail
- September 27, 2024: email from Enforcement Division regarding outstanding SEIs
- October 1, 2024: email from Enforcement Division regarding outstanding SEIs
- January 17, 2025: email from Enforcement Division regarding outstanding SEIs
- February 18, 2025: Report in Support of a Finding of Probable Cause was sent to Huang via certified mail and was returned unclaimed to the Commission on March 12, 2025
- April 10, 2025: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation be Prepared and Served sent to Huang via U.S. Mail
- August 17, 2025: substituted service of Accusation was completed
- December 30, 2025: letter to Huang informing them that a Default Decision and Order would appear on the agenda for the January 15, 2026 Commission meeting as a notice item, and would be presented at the February 12, 2026 meeting for Commission action
- February 3, 2026: Notice of Intent to Enter Default Decision and Order to Huang informing them that the Default Decision and Order would be presented at the March 19, 2026 meeting for Commission action

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VIOLATIONS

Huang committed five violations of the Act as follows:

COUNT 1

Failure to Timely File Assuming Office SEI

Huang had a duty to timely file the Assuming Office SEI by the May 22, 2020 due date. By failing to timely file the Assuming Office SEI, Huang violated Government Code Section 87300.

COUNT 2

Failure to Timely File 2020 Annual SEI

Huang had a duty to timely file the 2020 Annual SEI by the April 1, 2021 due date. By failing to timely file the 2020 Annual SEI, Huang violated Government Code Section 87300.

COUNT 3

Failure to Timely File 2021 Annual SEI

Huang had a duty to timely file the 2021 Annual SEI by the April 1, 2022 due date. By failing to timely file the 2021 Annual SEI, Huang violated Government Code Section 87300.

COUNT 4

Failure to Timely File 2022 Annual SEI

Huang had a duty to timely file the 2022 Annual SEI by the April 3, 2023 due date. By failing to timely file the 2022 Annual SEI, Huang violated Government Code Section 87300.

COUNT 5

Failure to Timely File 2023 Annual SEI

Huang had a duty to timely file the 2023 Annual SEI by the April 2, 2024 due date. By failing to timely file the 2023 Annual SEI, Huang violated Government Code Section 87300.

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CONCLUSION

This matter consists of five counts of violating the Act, which carry a maximum total administrative penalty of \$25,000.²⁹

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 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.³⁰

In this matter, Huang failed to timely file the Assuming Office SEI and four Annual SEIs for their position as Recreation Coordinator for the City of Los Angeles Department of Recreation and Parks.

Here, failure to file annual SEIs deprives the public of important information about a public official's economic interests which could lead to potential conflicts of interests regarding decisions they make in their official capacity. Huang filed the Assuming Office SEI approximately five years late, the 2020 Annual SEI approximately four years late, the 2021 Annual SEI approximately three years late, the 2022 Annual SEI approximately two years late, and the 2023 Annual SEI approximately one year late. Huang's violations deprived the public of important and timely information regarding Huang's economic interests. However, Huang eventually filed all of the outstanding SEIs and disclosed that Huang has no reportable interests.

Huang has no prior record of violations of the Act for SEI violations. Huang is also still in office.

The Enforcement Division also considers previous cases approved by the Commission in determining penalties. In this matter, the following case was used as a guideline.

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²⁹ Section 83116, subd. (c).

³⁰ Regulation 18361.5, subd. (e).

Counts 1-5

- *In the Matter of Tommie Nellon*, FPPC No. 18/512. (The Commission approved a default decision on November 19, 2020). The respondent failed to timely file four SEIs. At the time of the default, respondent was still in office. The respondent eventually filed the outstanding SEIs. The respondent had no prior enforcement history. The Commission imposed a penalty of \$3,000 per count, for a total penalty of \$12,000.

Here, just as in *Nellon*, Huang is still in office and eventually filed all five outstanding SEIs. Huang also does not have prior enforcement history. Therefore, a similar default penalty amount is recommended.

PROPOSED PENALTY

After considering the factors of Regulation 18361.5 and the penalties imposed in prior cases, a penalty of \$3,000 per count, for a total penalty of \$15,000, is recommended.



**DECLARATION OF CUSTODIAN OF RECORDS
CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
Enforcement Division**

CERTIFICATION OF RECORDS

The undersigned declares and certifies as follows:

1. I am employed as an Associate Governmental Program Analyst by the California Fair Political Practices Commission (Commission). My business address is: California Fair Political Practices Commission, 1102 Q St, Ste 3050, Sacramento, CA 95811.
2. I am a duly authorized custodian of the records maintained by the Commission in the Enforcement Division. As such, I am authorized to certify copies of those records as being true and correct copies of the original business records which are in the custody of the Commission.
3. I have reviewed documents maintained in *FPPC Case No. 2024-00501; Jesse Huang* and have caused copies to be made of documents contained therein. I certify that the copies attached hereto are true and correct copies of the documents prepared in the normal course of business and which are contained in files maintained by the Commission. The attached documents are as follows:

EXHIBIT A-1: Report in Support of a Finding of Probable Cause, dated February 13, 2025

EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated February 18, 2025; certified mail receipts; returned envelope; and USPS tracking history

EXHIBIT A-3: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated April 10, 2025

EXHIBIT A-4: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated April 11, 2025

EXHIBIT A-5: Accusation, dated June 9, 2025

- EXHIBIT A-6: Proof of Service for Accusation and accompanying documents on August 7, 2025 from process server, dated August 11, 2024
- EXHIBIT A-7: Assuming Office Statement of Economic Interests, filed April 30, 2025
- EXHIBIT A-8: Notifications from Filing Officer dated February 25, 2021 through July 7, 2021
- EXHIBIT A-9: 2020 Statement of Economic Interests, filed April 30, 2025
- EXHIBIT A-10: 2021 Statement of Economic Interests, filed April 30, 2025
- EXHIBIT A-11: 2022 Statement of Economic Interests, filed April 30, 2025
- EXHIBIT A-12: 2023 Statement of Economic Interests, filed April 30, 2025
- EXHIBIT A-13: Notice of Default Decision and Order, dated December 31, 2025
- EXHIBIT A-14: Notice of Intent to Enter Default Decision and Order, dated February 3, 2026

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 3, 2026, at Sacramento, California.



Shaina Elkin
Associate Governmental Program Analyst
Enforcement Division
Fair Political Practices Commission

Exhibit A-1

1 JAMES M. LINDSAY
Chief of Enforcement
2 KRISTIN E. GOULET
Commission Counsel, Enforcement Division
3 **FAIR POLITICAL PRACTICES COMMISSION**
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6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission

8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

9 **STATE OF CALIFORNIA**

10 In the Matter of) FPPC No. 2024-00501
11)
12) **REPORT IN SUPPORT OF A FINDING OF**
13) **PROBABLE CAUSE**
14)
15) Conference Date: TBA
16) Conference Time: TBA
17) Conference Location: Commission Offices
18) 1102 Q Street, Suite 3050
19) Sacramento, CA 95811
20)

JESSE HUANG,

Respondent.

21 **INTRODUCTION**

22 Respondent, Jesse Huang (“Huang”), assumed the position of Recreation Coordinator for the City
23 of Los Angeles Department of Recreation and Parks on April 22, 2020. As of the date of this report,
24 Huang is still serving with the City of Los Angeles Department of Recreation and Parks.

25 The Political Reform Act (the “Act”)¹ requires every agency to adopt and promulgate a Conflict
26 of Interest Code for designated employees, including a Recreation Coordinator, to disclose their
27 reportable economic interests on a Statement of Economic Interests (“SEI”) at various times pursuant to
28 their agency’s Conflict of Interest Code and the Fair Political Practices Commission’s regulations.

¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practice Commission are contained in §§ 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 Huang, a designated official, violated the Act by failing to timely file an Assuming Office SEI by the
2 May 22, 2020 deadline, a 2020 Annual SEI by the April 1, 2021 deadline, a 2021 Annual SEI by the
3 April 1, 2022 deadline, a 2022 Annual SEI by the April 3, 2023 deadline, and a 2023 Annual SEI by the
4 April 2, 2024 deadline.

5 **SUMMARY OF THE LAW**

6 The Act and its regulations are amended from time to time. The discussion below regarding
7 jurisdiction, the standard for finding probable cause, and the contents of the probable cause report
8 includes references to current law. Unless otherwise noted, all other legal references and discussions of
9 law pertain to the Act’s provisions as they existed at the time of the violations in this case.

10 **Jurisdiction**

11 The Fair Political Practices Commission (the “Commission”) has primary responsibility for the
12 impartial, effective administration and implementation of the Act.² This includes enforcement through
13 administrative prosecution.³ However, before the Commission’s Enforcement Division may commence
14 administrative prosecution by filing/serving an Accusation, a hearing officer (either the General Counsel
15 of the Commission or another attorney in the Commission’s Legal Division) must determine whether
16 there is probable cause that supports a reasonable belief or strong suspicion that one or more violations
17 of the Act occurred.⁴ Any finding of probable cause is required by law to be announced publicly, which
18 includes the posting of a summary of the allegations on the Commission’s website.⁵ After a finding of
19 probable cause, the Commission may then hold a hearing to determine what violations have occurred—
20 and levy an administrative penalty of up to \$5,000 for each violation.⁶

21 **Standard for Finding Probable Cause**

22 For the hearing officer to make a finding of probable cause, it is only necessary that he or she be
23 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act has

24 ² Section 83111.

25 ³ Section 83116.

26 ⁴ Sections 83115.5 and 83116; Regulations 18361, subd. (b), and 18361.4.

27 ⁵ Regulation 18361.4, subd. (g).

28 ⁶ Section 83116; Regulation 18361.4, subd. (g).

1 been violated.⁷ Probable cause may only be found if the Respondents were notified of the violations at
2 least 21 days prior to the hearing officer’s consideration of the alleged violations.⁸

3 **Contents of the Probable Cause Report**

4 The probable cause report is required to contain a summary of the law and evidence that supports
5 a finding of probable cause that each alleged violation of the Act has occurred, as well as a description
6 of any exculpatory evidence indicating a violation alleged in the report did not occur. The evidence
7 recited in the probable cause report may include hearsay.⁹

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

9 When enacting the Act, the people of California found and declared that previous laws regulating
10 political practices suffered from inadequate enforcement by state and local authorities.¹⁰ For this reason,
11 the Act is to be construed liberally to accomplish its purposes.¹¹

12 One central purpose of the Act is to increase transparency and decrease conflicts of interest in the
13 actions of public officials by requiring disclosure of their economic interests.¹² Another purpose of the
14 Act is to provide adequate enforcement mechanisms so that the Act will be “vigorously enforced.”¹³

15 **Conflict of Interest Codes**

16 The Act requires every state and local agency to develop a Conflict of Interest Code.¹⁴ These
17 codes must designate those officials who participate in making decisions which may foreseeably have a
18 material financial effect on any financial interest belonging to that official and require those designated
19 officials to disclose all reportable interests on SEIs.¹⁵ The requirements of an agency’s Conflict of Interest
20 Code have the force of law, and any violations of those requirements is deemed a violation of the Act.¹⁶

22 ⁷ Regulation 18361.4, subd. (a).

23 ⁸ Section 83115.5.

24 ⁹ Regulation 18361.4, subd. (b).

25 ¹⁰ Section 81001, subd. (h).

26 ¹¹ Section 81003.

27 ¹² Section 81002, subd. (c).

28 ¹³ Section 81002, subd. (f).

¹⁴ Section 87300.

¹⁵ Section 87302, subd. (a).

¹⁶ Section 87300.

1 **Regulation 18730 and Liability for Violation**

2 Regulation 18730 outlines the timing for disclosing the designated employees’ economic interests
3 as follows: All persons assuming designated positions shall file statements within 30 days after assuming
4 the designated positions.¹⁷; all designated employees shall annually file statements no later than April
5 1.¹⁸; and all designated employees who leave the designated positions shall file statements within 30 days
6 after leaving office.¹⁹ Any person who violates any provision of the Act is liable for administrative
7 penalties up to \$5,000 per violation.²⁰

8 **Filing Deadline on Weekend or Holiday**

9 If this title requires that a statement or report be filed before or on a specified date or during or
10 within a specified period, and the filing deadline falls on a Saturday, Sunday, or official state holiday, the
11 filing deadline for the statement or report shall be extended to the next regular business day.²¹

12 **City of Los Angeles Department of Recreation and Parks Conflict of Interests Code**

13 Recreation Coordinators for the City of Los Angeles Department of Recreation and Parks are
14 required to disclose all investments, business positions and sources of income from any source, individual
15 or business entity who provides or has sought to provide services, goods, or equipment to the Recreation
16 Coordinator’s division; who has been a party to or sought to become a party to a written agreement with
17 the Recreation Coordinator’s division; or for whom the Recreation Coordinator’s division has provided
18 a review, recommendation, or referral.²² Recreation Coordinators are also required to disclose all
19 interests in real property involved in an enforcement, regulatory, legislative, permitting, licensing, or
20 contractual decision made or pending by the Recreation Coordinator’s division.²³

21 ///

22 ///

23 _____
24 ¹⁷ Regulation 18730, subd. (b)(5)(B).

25 ¹⁸ Regulation 18730, subd. (b)(5)(C).

26 ¹⁹ Regulation 18730, subd. (b)(5)(D).

27 ²⁰ Sections 83116 and 83116.5.

28 ²¹ Section 81005.

²² City of Los Angeles Department of Recreation and Parks Conflict of Interests Code.

²³ Ibid.

1 The City of Los Angeles Department of Recreation and Parks incorporated by reference the
2 Political Reform Act, its associated regulations, and the instructions for Form 700 into the City of Los
3 Angeles Department of Recreation and Parks' Conflict of Interest Code.²⁴

4 **SUMMARY OF THE EVIDENCE**

5 According to the records maintained by the Los Angeles City Ethics Commission, Jesse Huang
6 has been a Recreation Coordinator for the City of Los Angeles Department of Recreation and Parks since
7 January 2, 2001. The position of Recreation Coordinator was added as a designated position to the City
8 of Los Angeles Department of Recreation and Parks' Conflict of Interest Code beginning on April 22,
9 2020. As such, Huang is considered to have assumed the position of Recreation Coordinator along with
10 its corresponding filing obligations on April 22, 2020. As a designated official with the City of Los
11 Angeles Department of Recreation and Parks, Huang was required to timely file an Assuming Office SEI
12 by the May 22, 2020 deadline, a 2020 Annual SEI by the April 1, 2021 deadline, a 2021 Annual SEI by
13 the April 1, 2022 deadline, a 2022 Annual SEI by the April 3, 2023 deadline, and a 2023 Annual SEI by
14 the April 2, 2024 deadline.

15 The Los Angeles City Ethics Commission contacted Huang in writing on or around July 7, 2021
16 to remind Huang of his 2020 Annual SEI filing obligation. After not receiving compliance from Huang
17 regarding his outstanding SEI, the Los Angeles City Ethics Commission referred the matter to the Fair
18 Political Practices Commission's Enforcement Division.

19 The Los Angeles City Ethics Commission informed the Enforcement Division of Huang's
20 outstanding Assuming Office and 2020, 2021, 2022, and 2023 Annual SEIs. Commission staff then
21 contacted Huang once via email, made two phone calls, and left two voice messages between April 30,
22 2024 and May 8, 2024 to remind him of his filing obligations. Huang never responded to these contact
23 attempts.

24 The Commission staff also contacted Huang via email at least six times, made two phone calls,
25 and left one voice message between July 31, 2024 to January 17, 2025 to remind him of his filing

26 ²⁴ Ibid.

1 obligations. Someone responded to a phone call on September 27, 2024, but that person claimed that
2 Enforcement staff had the wrong number. Huang never responded to any of the additional contact
3 attempts and his Assuming Office and 2020, 2021, 2022, and 2023 Annual SEIs remain outstanding as
4 he continues to serve as Recreation Coordinator for the City of Los Angeles Department of Recreation
5 and Parks.

6 **VIOLATIONS**

7 Count 1: Failure to Timely File an Assuming Office SEI

8 Huang failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of
9 Government Code Section 87300.

10 Count 2: Failure to Timely File a 2020 Annual SEI

11 Huang failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of
12 Government Code Section 87300.

13 Count 3: Failure to Timely File a 2021 Annual SEI

14 Huang failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of
15 Government Code Section 87300.

16 Count 4: Failure to Timely File a 2022 Annual SEI

17 Huang failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of
18 Government Code Section 87300.

19 Count 5: Failure to Timely File a 2023 Annual SEI

20 Huang failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of
21 Government Code Section 87300.

22 **EXCULPATORY INFORMATION**

23 None currently known.

24 ///

25 ///

26 ///

1 **CONCLUSION**

2 Probable cause exists to believe that Huang violated the Act as detailed above. The Enforcement
3 Division respectfully requests an order finding probable cause pursuant to Section 83115.5 and
4 Regulation 18361.4.

5
6 Dated: February 13, 2025.

Respectfully Submitted,

7 **FAIR POLITICAL PRACTICES COMMISSION**
8 James M. Lindsay
9 Chief of Enforcement

10 *Kristin E. Goulet*

11 _____
12 By: Kristin E. Goulet
13 Commission Counsel
14 Enforcement Division

Exhibit A-2

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is: Fair Political Practices Commission, 1102 Q Street, Suite 3050, Sacramento, California 95811. On February 18, 2025, I served the following document(s):

1. Letter dated February 18, 2025, from Kristin E. Goulet;
2. FPPC Case No. 2024-00501 Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet;
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission;
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings; and
6. Probable Cause Checklist.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By personal service. At _____ a.m./p.m.: _____

I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

By United States Postal Service. I enclosed the documents in a sealed envelope or package addressed to the person at the address listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Jesse Huang


I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on February 18, 2025.



Katelyn Rader



FAIR POLITICAL PRACTICES COMMISSION
1102 Q STREET, SUITE ~~1100~~ 3050
SACRAMENTO, CALIFORNIA 95811

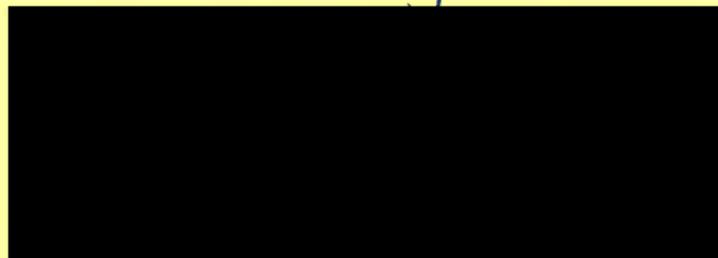


CERTIFIED MAIL



9589 0710 5270 0783 4029 37

Jesse Huang



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jesse Huang



9590 9402 8804 4005 9555 27

2. Article Number (Transfer from service label)

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PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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FAIR POLITICAL PRACTICES COMMISSION
1102 Q STREET, SUITE 3050
SACRAMENTO, CALIFORNIA 95811

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US POSTAGE
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BC: 95811654950 2347N067230-00531

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Jesse Huang



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Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to an individual at the address at 1:05 pm on March 12, 2025 in ZIP Code 95800.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

95800

March 12, 2025, 1:05 pm

In Transit to Next Facility

March 11, 2025

Arrived at USPS Facility

PASADENA, CA 91109

March 8, 2025, 3:11 pm

Unclaimed/Being Returned to Sender

[Redacted]

March 6, 2025, 11:15 am

Reminder to Schedule Redelivery of your item

February 25, 2025

Notice Left (No Authorized Recipient Available)

[Redacted]

Feedback

February 20, 2025, 12:42 pm

● Hide Tracking History

[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package) (https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

Exhibit A-3

1 ANGELA J. BRERETON
Assistant Chief of Enforcement
2 KRISTIN E. GOULET
Commission Counsel

3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5986
5 Email: kgoulet@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission

7
8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

9 **STATE OF CALIFORNIA**

10 In the Matter of) FPPC Case No. 2024-00501
11)
12) **EX PARTE REQUEST FOR A FINDING OF**
13) **PROBABLE CAUSE AND AN ORDER**
14) **THAT AN ACCUSATION BE PREPARED**
15) **AND SERVED**
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In the Matter of) FPPC Case No. 2024-00501
JESSE HUANG,)
Respondent.) Gov. Code § 83115.5

29 **TO THE HEARING OFFICER OF THE FAIR POLITICAL PRACTICES COMMISSION:**

30 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)¹ and Regulation 18361.4,
31 Respondent Jesse Huang (“Huang”) was served with copies of a Report in Support of a Finding of
32 Probable Cause (“PC Report”) in the above-entitled matter.² The PC Report, attached as “Exhibit A,”
33 was part of a packet of materials, including a cover letter, a memorandum describing probable cause
34 proceedings, and a probable cause checklist form, which was sent to Huang on February 18, 2025 by
35 certified mail, with return receipt requested, and was returned as undeliverable to the Fair Political
36 Practices Commission on March 12, 2025. A copy of the proof of service, USPS tracking confirmation,
37 and envelope containing the packet marked “Return to Sender” is attached as “Exhibit B.”

38 In the cover letter, dated February 18, 2025, and the packet of materials, Huang was advised that

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¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in §§ 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Gov. Code § 83115.5; Cal. Code Reg., Tit. 2, § 18361.4.

1 he could respond in writing to the PC Report and orally present the case to the Hearing Officer at a
2 probable cause conference to be held in Sacramento. Huang was further advised that in order to have a
3 probable cause conference, he needed to make a written request for one on or before 21 days of the date
4 he was served with the PC Report. Additionally, Huang was advised that if he did not request a probable
5 cause conference, such a conference would not be held, and probable cause would be determined based
6 solely on the PC Report, any written response by Huang, and any rebuttal submitted by the Enforcement
7 Division. To date, Huang has not submitted a written response to the PC Report and has not requested a
8 probable cause conference.

9 WHEREFORE, based on the attached PC Report, the Enforcement Division requests a finding
10 by the Hearing Officer that probable cause exists to believe that Huang committed five violations of the
11 Act, stated as follows:

12 **Count 1: Failure to Timely File an Assuming Officer SEI**

13 Huang failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of
14 Government Code Section 87300.

15 **Count 2: Failure to Timely File a 2020 Annual SEI**

16 Huang failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of
17 Government Code Section 87300.

18 **Count 3: Failure to Timely File a 2021 Annual SEI**

19 Huang failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of
20 Government Code Section 87300.

21 **Count 4: Failure to Timely File a 2022 Annual SEI**

22 Huang failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of
23 Government Code Section 87300.

24 **Count 5: Failure to Timely File a 2023 Annual SEI**

25 Huang failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of
26 Government Code Section 87300.

27 ///

1 Additionally, after finding probable cause exists, the Enforcement Division requests an order by
2 the Hearing Officer that an accusation be prepared against Huang and served upon Huang.³

3 A copy of this Request was mailed via certified mail to Huang on April 10, 2025 at the last
4 known address, as follows:

5 **Jesse Huang**
6 ████████████████████
7 ████████████████████

7 Dated: April 10, 2025

Respectfully Submitted,

8 **FAIR POLITICAL PRACTICES COMMISSION**
9 Angela J. Brereton
10 Assistant Chief of Enforcement

11 *Kristin E. Goulet*

12 _____
13 By: Kristin E. Goulet
14 Commission Counsel
15 Enforcement Division

16
17
18
19
20
21
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27 _____
28 ³ Gov. Code § 11503.

Exhibit A-4

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3
4 In the Matter of) FPPC No. 2024-00501
5)
6) JESSE HUANG,) FINDING OF PROBABLE CAUSE AND
7) Respondent.) ORDER TO PREPARE AND SERVE AN
8) ACCUSATION
9) Gov. Code § 83115.5
10)
11)
12)

13 By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
14 Accusation Be Prepared and Served (“Ex Parte Request”), dated April 10, 2025, the Enforcement
15 Division submitted the above-entitled matter to the Hearing Officer for a determination of Probable
16 Cause. As set forth in the Ex Parte Request, the Enforcement Division sent a Report in Support of a
17 Finding of Probable Cause (“PC Report”) to Respondent Jesse Huang (“Huang”) on February 18, 2025
18 by certified mail, return receipt requested. Accompanying the PC Report was a packet of materials that
19 informed the Respondent of his right to file a written response to the PC Report and to request a
20 probable cause conference within 21 days following service of the PC Report, or transmittal of any
21 requested records by the Enforcement Division. The packet was returned to the Fair Political Practices
22 Commission as undeliverable on March 12, 2025. During the 21 days that followed the return of the PC
23 Report, Respondent did not file a response to the PC Report, request records, or request a probable cause
24 conference. Pursuant to California Code of Regulations title 2, section 18361.4,¹ determination of
25 probable cause may be made solely on papers submitted when the respondent does not request a
26 probable cause conference.

27 In making a probable cause determination, it is the duty of the Hearing Officer of the Fair
28 Political Practices Commission to determine whether probable cause exists to believe that a respondent

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¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations.

1 violated the Political Reform Act as alleged by the Enforcement Division in the PC Report served on the
2 respondent.

3 Probable cause to believe a violation has occurred can be found to exist when “the evidence
4 sufficiently supports a reasonable belief or strong suspicion that the Act has been violated.”²

5 The PC Report served on Respondent Huang and the subsequent Ex Parte Request in this matter
6 alleges five violations of the Political Reform Act were committed, as follows:

7 Count 1: Failure to Timely File an Assuming Office SEI

8 Huang failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of
9 Government Code Section 87300.

10 Count 2: Failure to Timely File a 2020 Annual SEI

11 Huang failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of
12 Government Code Section 87300.

13 Count 3: Failure to Timely File a 2021 Annual SEI

14 Huang failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of
15 Government Code Section 87300.

16 Count 4: Failure to Timely File a 2022 Annual SEI

17 Huang failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of
18 Government Code Section 87300.

19 Count 5: Failure to Timely File a 2023 Annual SEI

20 Huang failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of
21 Government Code Section 87300.

22 Based on the Ex Parte Request given to me, I find that notice has been given to Huang.³ I further
23 find, based on the PC Report and the Ex Parte Request, that there is probable cause to believe that the
24 Huang violated the Political Reform Act as alleged in Counts 1 through 5, as identified above.

25 ///

26
27 ² Cal. Code Reg., tit. 2, § 18361.4, subd. (a).

³ Government Code § 83115.5; Cal. Code Reg., tit. 2, §18361.4, subd. (c).

1 I therefore direct that the Enforcement Division issue an accusation against Huang in accordance
2 with this finding.

3 IT IS SO ORDERED.

4
5 Dated: April 11, 2025

6 
7 _____
8 Hearing Officer
9 Fair Political Practices Commission

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Exhibit A-5

1 ANGELA J. BRERETON
Assistant Chief of Enforcement

2 KRISTIN E. GOULET
Commission Counsel

3 **FAIR POLITICAL PRACTICES COMMISSION**

4 1102 Q St, Suite 3050
Sacramento, CA 95811
Telephone: (279) 237-5986
5 Email: kgoulet@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission

8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

9 **STATE OF CALIFORNIA**

11	In the Matter of:) FPPC Case No. 2024-00501
12)
13	JESSE HUANG,) ACCUSATION
14)
15	Respondents.) (Gov. Code §11503)
16)
17)

18 Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding
19 of probable cause pursuant to Government Code Section 83115.5, alleges the following:

20 **JURISDICTION**

21 1. Complainant is the Enforcement Division of the Fair Political Practices Commission (the
22 “Commission”) and makes this Accusation in its official capacity and in the public interest.

23 2. The authority to bring this action is derived from Title 2, California Code of Regulations,
24 Sections 18361 and 18361.4, subdivision (g), and the statutory law of the State of California, specifically
25 including, but not limited to, Government Code Sections 83111, 83116, and 91000.5, which assign to the
26 Enforcement Division the duty to administer, implement, and enforce the provisions of the Political
27 Reform Act, found at Government Code Sections 81000 through 91014.

28 ///

1 **B. Regulation 18730 and Liability for Violation**

2 9. The Act requires every state and local agency to develop a Conflict of Interest Code.⁷ These
3 codes must designate those officials who participate in making decisions which may foreseeably have a
4 material financial effect on any financial interest belonging to that official and require those designated
5 officials to disclose all reportable interests on statements of economic interest (“SEI”).⁸ The requirements
6 of an agency’s Conflict of Interest Code have the force of law, and any violations of those requirements
7 is deemed a violation of the Act.⁹

8 **C. Duty to Timely File an Assuming Office Statement of Economic Interest**

9 10. The Act requires each new designated official to file an SEI within 30 days after assuming
10 office. If a statement or report is required to be filed before or on a specified date, and the filing deadline
11 falls on a Saturday, Sunday, or official state holiday, the filing deadline for the statement or report shall
12 be extended to the next regular business day.¹⁰ Assuming Office SEIs shall disclose investments, business
13 positions, and interests in real held on, and income received during the 12 months before the date of
14 assuming office.¹¹

15 **D. Duty to Timely File Annual Statements of Economic Interest**

16 11. The Act requires every designated official to annually file a statement disclosing their
17 investments, interests in real property, and income by filing an SEI by April 1 of each year.¹² When April
18 1 falls on a weekend or holiday, the filing deadline is extended to the next regular business day.¹³ Failure
19 to comply with the disclosure requirements is a violation of the Act.¹⁴

20 **E. City of Los Angeles Department of Recreation and Parks’ Conflict of Interest Code**

21 12. Recreation Coordinators for the City of Los Angeles Department of Recreation and
22 Parks are required to disclose all investments, business positions and sources of income from any
23 source, individual or business entity who provides or has sought to provide services, goods, or
24

25 ⁷ Section 87300.

26 ⁸ Section 87302, subd. (a).

27 ⁹ Section 87300.

28 ¹⁰ Section 81005.

¹¹ Section 87302, subd. (b).

¹² Sections 87302, subd. (b); Regulation 18730, subd. (b)(5)(C).

¹³ Section 81005.

¹⁴ Section 87300.

1 equipment to the Recreation Coordinator’s division; who has been a party to or sought to become a
2 party to a written agreement with the Recreation Coordinator’s division; or for whom the Recreation
3 Coordinator’s division has provided a review, recommendation, or referral.¹⁵ Recreation Coordinators
4 are also required to disclose all interests in real property involved in an enforcement, regulatory,
5 legislative, permitting, licensing, or contractual decision made or pending by the Recreation
6 Coordinator’s division.¹⁶

7 13. The City of Los Angeles Department of Recreation and Parks incorporated by reference
8 the Political Reform Act, its associated regulations, and the instructions for Form 700 into the City of
9 Los Angeles Department of Recreation and Parks’ Conflict of Interest Code.¹⁷

10 **F. Factors to be Considered by the Fair Political Practices Commission**

11 14. In framing a proposed order following a finding of a violation pursuant to Government
12 Code Section 83116, the Commission and the administrative law judge shall consider all the
13 surrounding circumstances including but not limited to the following factors set forth in Regulation
14 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the
15 specific violation; (2) The level of experience of the violator with the requirements of the Political
16 Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence
17 or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate,
18 negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the
19 Commission staff or any other governmental agency in a manner not constituting complete defense
20 under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern
21 and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and
22 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide
23 full disclosure.¹⁸

24 ///

25 ///

27 ¹⁵ City of Los Angeles Department of Recreation and Parks Conflict of Interests Code.

28 ¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Regulation 18361.5, subdivision (e).

GENERAL FACTS

15. Huang has been a Recreation Coordinator for the City of Los Angeles Department of Recreation and Parks since January 2, 2001. On April 22, 2020, the position of Recreation Coordinator was added as a designated position to the City of Los Angeles Department of Recreation and Parks' Conflict of Interest Code. As such, Huang is considered to have assumed the position of Recreation Coordinator along with its corresponding filing obligations on April 22, 2020. As of the date of this Accusation, Huang continues to hold this position.

16. Huang failed to timely file an Assuming Office SEI by the May 22, 2020 deadline.

17. Huang failed to timely file a 2020 Annual SEI by the April 1, 2021 deadline.

18. The Los Angeles City Ethics Commission contacted Huang once in writing on July 7, 2021 to remind him of his obligation to file a 2020 Annual SEI.

19. After not receiving compliance, the Los Angeles City Ethics Commission referred the matter to the Enforcement Division on December 21, 2021.

20. Huang failed to timely file a 2021 Annual SEI by the April 1, 2022 deadline.

21. Huang failed to timely file a 2022 Annual SEI by the April 3, 2023 deadline.¹⁹

22. Huang failed to timely file a 2023 Annual SEI by the April 2, 2024 deadline.²⁰

23. Between April 30, 2024 and May 8, 2024, Commission staff contacted Huang numerous times to gain compliance. Huang never engaged in any of these contact attempts.

24. Between July 31, 2024 and January 17, 2025, the Enforcement Division made numerous additional contact attempts to Huang to gain his compliance. Huang still did not engage in any of these contact attempts.

25. Huang finally filed all of his outstanding SEIs on April 30, 2025.

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¹⁹ The due date was extended to April 3, 2023 because April 1, 2023 fell on a Saturday, and the due date had to be extended to the next regular business day.

²⁰ The due date was extended to April 2, 2024 because April 1, 2024 was a state holiday (Cesar Chavez Day, observed), and the due date had to be extended to the next regular business day.

1 **PROCEDURAL HISTORY**

2 26. The Enforcement Division initiated an administrative action against Huang in this matter
3 by serving a packet containing a cover letter, a Report in Support of a Finding of Probable Cause (“PC
4 Report”), a fact sheet regarding probable cause proceedings, selected sections of the Government Code
5 regarding probable cause proceedings for the Commission, and selected regulations of the Commission
6 regarding probable cause proceedings.

7 27. Huang was mailed the PC Report via certified mail on February 18, 2025 and it was
8 returned to the Enforcement Division by the post office on March 12, 2025.²¹ The information contained
9 in the PC Report packet advised Huang that he had 21 days in which to request a probable cause
10 conference, file a written response to the PC Report, or both. During the 21 days that followed service of
11 the PC Report, Huang did not file a response to the PC Report or request a probable cause conference.

12 28. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
13 Accusation Be Prepared and Served (“Ex Parte Request”), dated April 10, 2025, the Enforcement Division
14 submitted the matter to the Hearing Officer for a determination of probable cause.

15 29. On or about April 11, 2025, the Hearing Officer issued an order finding, based on the Ex
16 Parte Request and the PC Report, that there was probable cause to believe Huang violated the Act and
17 directed the Enforcement Division to issue an Accusation against Huang in accordance with the finding.

18 **VIOLATIONS**

19 30. Huang committed 5 violations of the Act as follows:

20 **Count 1**

21 **Failure to Timely File an Assuming Office SEI**

22 31. Complainant incorporates paragraphs 1–30 of this Accusation, as though completely set
23 forth herein.

24 32. Huang, as a designated official, had a duty under the Act to file an Assuming Office SEI
25 May 22, 2020.

26 33. Huang failed to timely file his Assuming Office SEI by the May 22, 2020 due date.
27

28 _____
²¹ Section 83115.5.

1 46. By failing to file his 2022 Annual SEI by the April 3, 2023 deadline, Huang violated
2 Government Code section 87300.

3 **Count 5**

4 **Failure to Timely File a 2023 Annual SEI**

5 47. Complainant incorporates paragraphs 1–30 of this Accusation, as though completely set
6 forth herein.

7 48. Huang, as a designated official, had a duty under the Act to file a 2023 Annual SEI by
8 April 2, 2024.

9 49. Huang failed to timely file his 2023 Annual SEI by the April 2, 2024 due date.

10 50. By failing to file his 2023 Annual SEI by the April 2, 2024 deadline, Huang violated
11 Government Code section 87300.

12 **MITIGATING OR EXCULPATORY FACTORS**

13 51. The Enforcement Division is not aware of mitigating or exculpatory factors.

14 **AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS**

15 52. The Enforcement Division is not aware of aggravating factors or other relevant materials.

16 **PRAYER**

17 WHEREFORE, Complainant prays as follows:

- 18 1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and
19 Regulation 18361.5, and at such hearing find that Huang violated the Act as alleged herein;
- 20 2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
21 order Huang to pay a monetary penalty of up to \$5,000 for the violation of the Political
22 Reform Act alleged in **Count 1**;
- 23 3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
24 order Huang to pay a monetary penalty of up to \$5,000 for the violation of the Political
25 Reform Act alleged in **Count 2**;
- 26 4. That the Fair Political Practices Commission, and pursuant to Section 83116, subdivision
27 (c), order Huang to pay a monetary penalty of up to \$5,000 for the violation of the Political
28 Reform Act alleged in **Count 3**;

- 1 5. That the Fair Political Practices Commission, and pursuant to Section 83116, subdivision
2 (c), order Huang to pay a monetary penalty of up to \$5,000 for the violation of the Political
3 Reform Act alleged in **Count 4**;
- 4 6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order Huang to pay a monetary penalty of up to \$5,000 for the violation of the Political
6 Reform Act alleged in **Count 5**;
- 7 7. That the Fair Policial Practices Commission, pursuant to Regulation 18361.5, subdivision
8 (e), consider the following factors in framing a proposed order following a finding of a
9 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
10 by the specific violation; (2) The level of experience of the violator with the requirements
11 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
12 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
13 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
14 violator demonstrated good faith by consulting the Commission staff or any other
15 governmental agency in a manner not constituting complete defense under Government
16 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
17 whether the violator has a prior record of violations of the Political Reform Act or similar
18 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
19 amendments to provide full disclosure.
- 20 8. That the Fair Political Practices Commission grant such other and further relief as it deems
21 just and proper.

22
23 Dated: 6/9/2025



Angela J. Breerton, Assistant Chief of
Enforcement
Fair Political Practices Commission

Exhibit A-6

: In the Matter of Jesse Huang
DEFENDANT:

CASE NUMBER:
2024-00501

9. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 8/11/2025

Robert Hall

(TYPE OR PRINT NAME OF PERSON WHO SERVED THE PAPERS)



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

Exhibit A-7

COVER PAGE

A PUBLIC DOCUMENT

Filed Date: 04/30/2025 02:30 PM
SAN: 011300006-STH-0006

Please type or print in ink.

NAME OF FILER (LAST) Huang (FIRST) Jesse (MIDDLE)

1. Office, Agency, or Court

Agency Name (Do not use acronyms)

Recreation and Parks, Department of

Division, Board, Department, District, if applicable

Your Position

Recreation Coordinator

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State Judge, Retired Judge, Pro Tem Judge, or Court Commissioner (Statewide Jurisdiction)
- Multi-County _____ County of _____
- City of Los Angeles Other _____

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2019, through December 31, 2019. Leaving Office: Date Left ____/____/____ (Check one circle.)
- or- The period covered is ____/____/____, through December 31, 2019. The period covered is January 1, 2019, through the date of leaving office.
- Assuming Office: Date assumed 04 / 22 / 2020 -or- The period covered is ____/____/____, through the date of leaving office.
- Candidate: Date of Election _____ and office sought, if different than Part 1: _____

4. Schedule Summary (must complete) ► Total number of pages including this cover page: 1

Schedules attached

- Schedule A-1 - Investments – schedule attached Schedule C - Income, Loans, & Business Positions – schedule attached
- Schedule A-2 - Investments – schedule attached Schedule D - Income – Gifts – schedule attached
- Schedule B - Real Property – schedule attached Schedule E - Income – Gifts – Travel Payments – schedule attached

-or- None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
(Business or Agency Address Recommended - Public Document)
221 N. Figueroa Street, Suite 380 Los Angeles CA 90012
DAYTIME TELEPHONE NUMBER EMAIL ADDRESS
(213) 202-3222

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed 04/30/2025 02:30 PM Signature Jesse Huang
(month, day, year) (File the originally signed paper statement with your filing official.)

Exhibit A-8

It is time once again to file your annual **Statement of Economic Interests (SEI) Form 700**. This year, the deadline for filing this form is:

Thursday, April 1, 2021

State and City laws require you to file an SEI because you participate in making City decisions. This financial disclosure is one of the cornerstones of open and accountable government and serves two important purposes:

- *It helps you monitor your financial interests and avoid participating in City decisions when those interests might be affected.*
- *It helps assure the public that, as decision makers, we are taking steps to avoid conflicts of interests.*

To file your 2021 SEI, please complete these three steps:

1. Identify your position's disclosure category.

Your disclosure category is located in [your agency's conflict of interests \(COI\) code](#).

2. Identify your reportable interests.

- a. Your disclosure category identifies which financial interests you must report, based on your position and decision-making authority. Disclosable interests may include income, gifts, investments, interests in real property, and business positions. You may also be required to report 50 percent of your spouse's or registered domestic partner's income, as well as investments and interests in real property held by your spouse, registered domestic partner, or dependent child.
- b. Interests identified in your disclosure category must be reported if they were held any time from January 1 through December 31, 2020. If you started in your position from October 1 through December 31, 2019, you must report interests held from your start date through December 31, 2020.
- c. The attached Form 700 reference pamphlet provides useful definitions and examples of commonly reported interests.

3. File Form 700 using eDisclosure.

- a. Log into [eDisclosure](#). Your login ID is your email address, unless you changed it. If you don't remember your login ID, you can have it emailed to you by clicking on the "forgot login ID" link on the eDisclosure homepage. If you don't remember your password, you may request a new one by clicking on the "forgot password" link on the eDisclosure homepage.
- b. Select your Form 700 filing and click "Start Filing Now". You may populate this year's filing with the information you disclosed on your last filing by identifying which schedules you need to file this year and checking the "Copy Schedule info from prior filing" box.
- c. Be sure your form completely and accurately identifies your reportable interests.
- d. Your filing is not complete until you **click "Electronicall Submit"**.

Detailed information to assist you with your SEI filing can be found under “Help” in the left-hand column of eDisclosure. If you have additional questions, please contact the Ethics Commission at (213) 978-1960 or ethics.sei@lacity.org

As a reminder, late penalties must be assessed for forms not filed by April 1. By law, the penalties are \$10 per day (\$100 maximum) for Form.

THANK YOU for helping to foster open and accountable City government

If you think you have received this email in error, please [contact your agency's ethics liaison](#).

As a reminder, your annual **Statement of Economic Interests (SEI) Form 700** is due on:

Thursday, April 1, 2021

State and City laws require you to file an SEI because you participate in making City decisions. This financial disclosure is one of the cornerstones of open and accountable government and serves two important purposes:

- *It helps you monitor your financial interests and avoid participating in City decisions when those interests might be affected.*
- *It helps assure the public that, as decision makers, we are taking steps to avoid conflicts of interests.*

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2. Identify your reportable interests.

- a. Your disclosure category identifies which financial interests you must report, based on your position and decision-making authority. Disclosable interests may include income, gifts, investments, interests in real property, and business positions. You may also be required to report 50 percent of your spouse's or registered domestic partner's income, as well as investments and interests in real property held by your spouse, registered domestic partner, or dependent child.
- b. Interests identified in your disclosure category must be reported if they were held any time from January 1 through December 31, 2020. If you started in your position from October 1 through December 31, 2019, you must report interests held from your start date through December 31, 2020.
- c. The attached Form 700 reference pamphlet provides useful definitions and examples of commonly reported interests.

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- b. Select your Form 700 filing and click "Start Filing Now". You may populate this year's filing with the information you disclosed on your last filing by identifying which schedules you need to file this year and checking the "Copy Schedule info from prior filing" box.
- c. Be sure your form completely and accurately identifies your reportable interests.
- d. Your filing is not complete until you **click "Electronically Submit"**.

Detailed information to assist you with your SEI filing can be found under “Help” in the left-hand column of eDisclosure. If you have additional questions, please contact the Ethics Commission at (213) 978-1960 or ethics.sei@lacity.org

As a reminder, late penalties must be assessed for forms not filed by April 1. By law, the penalties are \$10 per day (\$100 maximum) for the Form 700.

THANK YOU for helping to foster open and accountable City government

If you think you have received this email in error, please [contact your agency's ethics liaison](#).

As a reminder, your annual **Statement of Economic Interests (SEI) Form 700** is due on:

Thursday, April 1, 2021

State and City laws require you to file an SEI because you participate in making City decisions. This financial disclosure is one of the cornerstones of open and accountable government and serves two important purposes:

- *It helps you monitor your financial interests and avoid participating in City decisions when those interests might be affected.*
- *It helps assure the public that, as decision makers, we are taking steps to avoid conflicts of interests.*

To file your 2021 SEI, please complete these three steps:

1. Identify your position's disclosure category.

Your disclosure category is located in [your agency's conflict of interests \(COI\) code](#).

2. Identify your reportable interests.

- a. Your disclosure category identifies which financial interests you must report, based on your position and decision-making authority. Disclosable interests may include income, gifts, investments, interests in real property, and business positions. You may also be required to report 50 percent of your spouse's or registered domestic partner's income, as well as investments and interests in real property held by your spouse, registered domestic partner, or dependent child.
- b. Interests identified in your disclosure category must be reported if they were held any time from January 1 through December 31, 2020. If you started in your position from October 1 through December 31, 2019, you must report interests held from your start date through December 31, 2020.
- c. The attached Form 700 reference pamphlet provides useful definitions and examples of commonly reported interests.

3. File Form 700 using eDisclosure.

- a. Log into [eDisclosure](#). Your login ID is your email address, unless you changed it. If you don't remember your login ID, you can have it emailed to you by clicking on the "forgot login ID" link on the eDisclosure homepage. If you don't remember your password, you may request a new one by clicking on the "forgot password" link on the eDisclosure homepage.
- b. Select your Form 700 filing and click "Start Filing Now". You may populate this year's filing with the information you disclosed on your last filing by identifying which schedules you need to file this year and checking the "Copy Schedule info from prior filing" box.
- c. Be sure your form completely and accurately identifies your reportable interests.
- d. Your filing is not complete until you **click "Electronically Submit"**.

Detailed information to assist you with your SEI filing can be found under “Help” in the left-hand column of eDisclosure. If you have additional questions, please contact the Ethics Commission at (213) 978-1960 or ethics.sei@lacity.org

As a reminder, late penalties must be assessed for forms not filed by April 1. By law, the penalties are \$10 per day (\$100 maximum) for the Form 700.

THANK YOU for helping to foster open and accountable City government

If you think you have received this email in error, please [contact your agency's ethics liaison](#).

As a reminder, your annual **Statement of Economic Interests (SEI) Form 700** is due **TODAY**:

Thursday, April 1, 2021

State and City laws require you to file an SEI because you participate in making City decisions. This financial disclosure is one of the cornerstones of open and accountable government and serves two important purposes:

- *It helps you monitor your financial interests and avoid participating in City decisions when those interests might be affected.*
- *It helps assure the public that, as decision makers, we are taking steps to avoid conflicts of interests.*

To file your 2021 SEI, please complete these three steps:

1. Identify your position's disclosure category.

Your disclosure category is located in [your agency's conflict of interests \(COI\) code](#).

2. Identify your reportable interests.

- a. Your disclosure category identifies which financial interests you must report, based on your position and decision-making authority. Disclosable interests may include income, gifts, investments, interests in real property, and business positions. You may also be required to report 50 percent of your spouse's or registered domestic partner's income, as well as investments and interests in real property held by your spouse, registered domestic partner, or dependent child.
- b. Interests identified in your disclosure category must be reported if they were held any time from January 1 through December 31, 2020. If you started in your position from October 1 through December 31, 2019, you must report interests held from your start date through December 31, 2020.
- c. The attached Form 700 reference pamphlet provides useful definitions and examples of commonly reported interests.

3. File Form 700 using eDisclosure.

- a. Log into [eDisclosure](#). Your login ID is your email address, unless you changed it. If you don't remember your login ID, you can have it emailed to you by clicking on the "forgot login ID" link on the eDisclosure homepage. If you don't remember your password, you may request a new one by clicking on the "forgot password" link on the eDisclosure homepage.
- b. Select your Form 700 filing and click "Start Filing Now". You may populate this year's filing with the information you disclosed on your last filing by identifying which schedules you need to file this year and checking the "Copy Schedule info from prior filing" box.
- c. Be sure your form completely and accurately identifies your reportable interests.
- d. Your filing is not complete until you **click "Electronically Submit"**.

Detailed information to assist you with your SEI filing can be found under “Help” in the left-hand column of eDisclosure. If you have additional questions, please contact the Ethics Commission at (213) 978-1960 or ethics.sei@lacity.org

As a reminder, late penalties must be assessed for forms not filed by April 1. By law, the penalties are \$10 per day (\$100 maximum) for the Form 700.

THANK YOU for helping to foster open and accountable City government

If you think you have received this email in error, please [contact your agency's ethics liaison](#).

Dear Jesse Huang,

We are following up on the annual filing requirement for Form 700. Our records indicate that we have not received your 2020 annual Form 700, which was due on April 1, 2021.

State law imposes a fine of \$10 per day, up to \$100, for the late filing of Form 700. See California Government Code § 91013.

Accordingly, the following fine has been assessed:

Agency	Position	Form Type	Days Late	Fine Owed
Recreation and Parks, Department of	Recreation Coordinator	Form 700	97	\$100.00
Total				\$100.00

To comply with the filing requirements, you must take the following steps by **August 6, 2021**:

1. Electronically submit your Form 700 via eDisclosure at <https://www.southtechhosting.com/LosAngelesCity/eDisclosure/>; and
2. Do one of the following:
 - a. Submit a check or money order, payable to the City of Los Angeles in the amount of **\$100.00**, to the Ethics Commission at 200 North Spring Street, Suite 2410, Los Angeles, CA 90012; or
 - b. Request a waiver by submitting a detailed explanation of why your forms were filed after the deadline. **Late fines may not be waived for the following and similar reasons:**
 - You were not physically in the office or were telecommuting.
 - You were on vacation.
 - It was your busy season.
 - Your spouse or assistant failed to file the form on your behalf.
 - You needed additional time to gather information in order to file.
 - You were waiting for professional assistance from financial advisor, CPA, or the Ethics Commission.
 - You have never been late before and promise to file on time in the future.
 - You did not receive a reminder to file.

To request a waiver, please do the following:

- i. After you have submitted all of your outstanding annual forms in eDisclosure, select "Outstanding Late Fines" from the "Filer" menu on the left side of the screen.
- ii. Select the fines for which you would like to request a waiver and select "Request a Waiver."
- iii. Enter a detailed description of why your forms were filed after the deadline.
- iv. Select "Submit."

We must receive your forms and either payment in full or a request for a waiver by **August 6, 2021**. Requests for waivers submitted after **August 6, 2021** will not be considered. If we do not receive your filings and either full payment or a waiver request by the deadline, this matter will be referred to the Ethics Commission's Enforcement Division. In addition to the late filing fine already accrued, an administrative

enforcement penalty of up to \$5,000 per violation may be imposed. See Los Angeles City Charter § 706(c)(3); Los Angeles Municipal Code §§ 49.5.16(D), 49.5.17.

Please contact us at ethics.sei@lacity.org or (213) 978-1960 if you have any questions regarding this email or the annual filing requirement.

Thank you.

Exhibit A-9

STATEMENT OF ECONOMIC INTERESTS
COVER PAGE
A PUBLIC DOCUMENT

Filed Date: 04/30/2025 02:31 PM
SAN: 011300006-STH-0006

Please type or print in ink.

NAME OF FILER (LAST) (FIRST) (MIDDLE)
Huang Jesse

1. Office, Agency, or Court

Agency Name (Do not use acronyms)
Recreation and Parks, Department of
Division, Board, Department, District, if applicable Your Position
Recreation Coordinator

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State Judge, Retired Judge, Pro Tem Judge, or Court Commissioner (Statewide Jurisdiction)
- Multi-County _____ County of _____
- City of Los Angeles Other _____

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2020, through December 31, 2020. Leaving Office: Date Left ____/____/_____
(Check one circle.)
-or- The period covered is 04 / 22 / 2020, through December 31, 2020. The period covered is January 1, 2020, through the date of leaving office.
- Assuming Office: Date assumed ____/____/_____. -or- The period covered is ____/____/_____, through the date of leaving office.
- Candidate: Date of Election _____ and office sought, if different than Part 1: _____

4. Schedule Summary (must complete) ► Total number of pages including this cover page: 1

Schedules attached

- Schedule A-1 - Investments – schedule attached Schedule C - Income, Loans, & Business Positions – schedule attached
- Schedule A-2 - Investments – schedule attached Schedule D - Income – Gifts – schedule attached
- Schedule B - Real Property – schedule attached Schedule E - Income – Gifts – Travel Payments – schedule attached

-or- None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
(Business or Agency Address Recommended - Public Document)
221 N. Figueroa Street, Suite 380 Los Angeles CA 90012
DAYTIME TELEPHONE NUMBER EMAIL ADDRESS
(213) 202-3222

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed 04/30/2025 02:31 PM Signature Jesse Huang
(month, day, year) (File the originally signed paper statement with your filing official.)

Exhibit A-10

STATEMENT OF ECONOMIC INTERESTS
COVER PAGE
A PUBLIC DOCUMENT

Filed Date: 04/30/2025 02:32 PM
SAN: 011300006-STH-0006

Please type or print in ink.

NAME OF FILER (LAST) (FIRST) (MIDDLE)
Huang Jesse

1. Office, Agency, or Court

Agency Name (Do not use acronyms)
Recreation and Parks, Department of
Division, Board, Department, District, if applicable Your Position
Recreation Coordinator

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State Judge, Retired Judge, Pro Tem Judge, or Court Commissioner (Statewide Jurisdiction)
- Multi-County _____ County of _____
- City of Los Angeles Other _____

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2021, through December 31, 2021. Leaving Office: Date Left ____/____/_____
(Check one circle.)
- or- The period covered is ____/____/_____, through December 31, 2021. The period covered is January 1, 2021, through the date of leaving office.
- Assuming Office: Date assumed ____/____/_____. -or- The period covered is ____/____/_____, through the date of leaving office.
- Candidate: Date of Election _____ and office sought, if different than Part 1: _____

4. Schedule Summary (must complete) ► Total number of pages including this cover page: 1

Schedules attached

- Schedule A-1 - Investments – schedule attached Schedule C - Income, Loans, & Business Positions – schedule attached
- Schedule A-2 - Investments – schedule attached Schedule D - Income – Gifts – schedule attached
- Schedule B - Real Property – schedule attached Schedule E - Income – Gifts – Travel Payments – schedule attached

-or- None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
(Business or Agency Address Recommended - Public Document)
221 N. Figueroa Street, Suite 380 Los Angeles CA 90012
DAYTIME TELEPHONE NUMBER EMAIL ADDRESS
(213) 202-3222

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed 04/30/2025 02:32 PM Signature Jesse Huang
(month, day, year) (File the originally signed paper statement with your filing official.)

Exhibit A-11

STATEMENT OF ECONOMIC INTERESTS
COVER PAGE
A PUBLIC DOCUMENT

Filed Date: 04/30/2025 02:34 PM
SAN: 011300006-STH-0006

Please type or print in ink.

NAME OF FILER (LAST) (FIRST) (MIDDLE)
Huang Jesse

1. Office, Agency, or Court

Agency Name (Do not use acronyms)
Recreation and Parks, Department of
Division, Board, Department, District, if applicable Your Position
Recreation Coordinator

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State Judge, Retired Judge, Pro Tem Judge, or Court Commissioner (Statewide Jurisdiction)
- Multi-County _____ County of _____
- City of Los Angeles Other _____

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2022, through December 31, 2022. Leaving Office: Date Left ____/____/____ (Check one circle.)
- or- The period covered is ____/____/____, through December 31, 2022. The period covered is January 1, 2022, through the date of leaving office.
- Assuming Office: Date assumed ____/____/____ -or- The period covered is ____/____/____, through the date of leaving office.
- Candidate: Date of Election _____ and office sought, if different than Part 1: _____

4. Schedule Summary (required)

► Total number of pages including this cover page: 1

Schedules attached

- Schedule A-1 - Investments – schedule attached Schedule C - Income, Loans, & Business Positions – schedule attached
- Schedule A-2 - Investments – schedule attached Schedule D - Income – Gifts – schedule attached
- Schedule B - Real Property – schedule attached Schedule E - Income – Gifts – Travel Payments – schedule attached

-or- None - No reportable interests on any schedule

5. Verification

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(Business or Agency Address Recommended - Public Document)
221 N. Figueroa Street, Suite 380 Los Angeles CA 90012
DAYTIME TELEPHONE NUMBER EMAIL ADDRESS
(213) 202-3222

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed 04/30/2025 02:34 PM Signature Jesse Huang
(month, day, year) (File the originally signed paper statement with your filing official.)

Exhibit A-12

STATEMENT OF ECONOMIC INTERESTS
COVER PAGE
A PUBLIC DOCUMENT

Filed Date: 04/30/2025 02:35 PM
SAN: 011300006-STH-0006

Please type or print in ink.

NAME OF FILER (LAST) (FIRST) (MIDDLE)
Huang Jesse

1. Office, Agency, or Court

Agency Name (Do not use acronyms)
Recreation and Parks, Department of
Division, Board, Department, District, if applicable Your Position
Recreation Coordinator
▶ If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State Judge, Retired Judge, Pro Tem Judge, or Court Commissioner (Statewide Jurisdiction)
- Multi-County _____ County of _____
- City of Los Angeles Other _____

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2023, through December 31, 2023. Leaving Office: Date Left ____/____/____ (Check one circle.)
- or- The period covered is ____/____/____, through December 31, 2023. The period covered is January 1, 2023, through the date of leaving office.
- Assuming Office: Date assumed ____/____/____ -or- The period covered is ____/____/____, through the date of leaving office.
- Candidate: Date of Election _____ and office sought, if different than Part 1: _____

4. Schedule Summary (required)

▶ Total number of pages including this cover page: 1

Schedules attached

- Schedule A-1 - Investments – schedule attached Schedule C - Income, Loans, & Business Positions – schedule attached
- Schedule A-2 - Investments – schedule attached Schedule D - Income – Gifts – schedule attached
- Schedule B - Real Property – schedule attached Schedule E - Income – Gifts – Travel Payments – schedule attached

-or- None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
(Business or Agency Address Recommended - Public Document)
221 N. Figueroa Street, Suite 380 Los Angeles CA 90012
DAYTIME TELEPHONE NUMBER EMAIL ADDRESS
(213) 202-3222

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed 04/30/2025 02:35 PM Signature Jesse Huang
(month, day, year) (File the originally signed paper statement with your filing official.)

Exhibit A-13



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

December 31, 2025

Jesse Huang
[REDACTED]
[REDACTED]

221 N. Figueroa Street, Suite #350
Los Angeles, CA 90012

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC Case No. 2024-00501; In the Matter of Jesse Huang

Dear Jesse Huang:

On August 17, 2025, you were served with an accusation via substituted service in the above-referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default will appear on the published agenda for the Commission’s public meeting on **January 15, 2026**. This agenda will be public and you could be contacted by the media with questions. The Commission will be asked to adopt the default at the subsequent public meeting on **February 12, 2026** and impose an administrative penalty of \$15,000 against you.

Following the issuance of the default, the Commission will obtain a judgment in superior court for the amount owed and then take action to collect the judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

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¹ Government Code section 11505.

You may still resolve this matter informally by way of a stipulated settlement if an agreement can be reached prior to this matter appearing for consideration by the Commission. Please contact me at (279) 237-5986 or kgoulet@fppc.ca.gov if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

Kristin E. Goulet

Kristin E. Goulet
Commission Counsel
Enforcement Division

Exhibit A-14



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

February 3, 2026

Jesse Huang
[REDACTED]
[REDACTED]

221 N. Figueroa Street, Suite #350
Los Angeles, CA 90012

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC No. 2024-00501; In the Matter of Jesse Huang

Dear Jesse Huang:

On August 17, 2025, you were served with an accusation via substituted service in the above referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default appeared on the published agenda for the Commission’s public meeting on January 15, 2026. The Commission will be asked to adopt the default at its public meeting scheduled for **March 19, 2026** and impose an administrative penalty of \$15,000 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on February 12, 2026 is enclosed with this letter.

You may, but you are not required to, provide a response brief, along with any supporting materials, no later than five calendar days before the Commission hearing at which the default is scheduled to be heard. Your response brief must be served on the Commission Assistant, at the above address.

Following the issuance of the default order and imposition of the administrative penalty, we will commence legal proceedings to collect this fine, which may include converting the Commission’s order to a court judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

¹ Government Code Section 11505.

This letter is your last opportunity to resolve this matter informally by way of a stipulated settlement, before the default proceedings are commenced. If we do not reach a resolution, the enclosed documents will be placed on the Commission's agenda for the **March 19, 2026** meeting. Please contact me at (279) 237-5986 or kgoulet@fppc.ca.gov if you wish to enter into a negotiated settlement.

Sincerely,

A handwritten signature in blue ink that reads "Kristin E. Goulet".

Kristin E. Goulet
Commission Counsel
Enforcement Division

Enclosures: Default Decision and Order, Exhibit 1 and attachments