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7
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

9 STATE OF CALIFORNIA

10
11 In the Matter of

12 STEVEN SANCHEZ,

13 Respondent.

) FPPC No.: 22/887

)
) DEFAULT DECISION AND
) ORDER

) (Government Code Sections 11506
) and 11520)

14
15
16
17 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
18 submits this Default Decision and Order for consideration by the Fair Political Practices Commission at
19 its next regularly scheduled meeting.

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

- 23 1. An Order Finding Probable Cause;
24 2. An Accusation;
25 3. A Notice of Defense (Two Copies per Respondent);
26 4. A Statement to Respondent; and
27

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

EXHIBIT 1

INTRODUCTION

Respondent, Steven Sanchez (“Sanchez”) was a successful candidate for the Franklin-McKinley Elementary School Board in the November 8, 2022 General Election. This matter arose out of a Filing Officer Referral from the Santa Clara County Registrar of Voters (the “ROV”).

The Political Reform Act (the “Act”)¹ defines a “candidate” as any elected officer, which includes an officeholder. The Act requires candidates to file campaign statements at specific times disclosing information regarding contributions received and expenditures made. Sanchez violated the Act by failing to timely file campaign statements during calendar years 2022, 2023, and 2024.

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 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

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.

⁵ Section 11506, subd. (a)(1)–(6).

⁶ Section 11506, subd. (c).

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 that person's 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 at Exhibit 1, A-1 through A-6, and A-12 through A-13, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against Sanchez in this matter by serving them with a Report in Support of a Finding of Probable Cause (the "Report") (Certification, Exhibit A-1) by certified mail.¹² Sanchez was served with the Report on March 17, 2025. (Certification, Exhibit A-2.) The administrative action commenced on March 17, 2025, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on Sanchez 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. Sanchez did not request a probable cause conference or submit a written response to the Report.

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.

B. Ex Parte Request for a Finding of Probable Cause

Because Sanchez 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 22, 2025. (Certification, Exhibit A-3.)

On April 25, 2025, the Hearing Officer, Legal Division, Karen Harrison, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Sanchez. (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.¹³

Section 11503(a) 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 their 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 their 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.

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 11507.7.¹⁴ The APA also sets forth the language required in the accompanying statement to the respondent.¹⁵

¹³ Regulation 18361.4, subd. (g).

¹⁴ Section 11505, subd. (a).

¹⁵ Section 11505, subd. (b).

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.¹⁶

On May 2, 2025, the Commission’s Assistant Chief of Enforcement, Angela Brereton, issued an Accusation against Sanchez. (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 Sanchez by substituted service on June 16, 2025. (Certification, Exhibit A-6.)

Along with the Accusation, the Enforcement Division served Sanchez 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. Sanchez did not file a Notice of Defense within the statutory time period, which ended on July 1, 2025.

As a result, on November 5, 2025, the Enforcement Division sent a letter to Sanchez 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-12.)

On February 5, 2026, the Enforcement Division sent another letter to Sanchez 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-13.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred in 2022, 2023, 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 ensure voters are fully informed and improper practices are inhibited by requiring candidates and their committees to disclose all contributions and expenditures made throughout a campaign.¹⁷ Along these lines, the Act includes a comprehensive campaign reporting system.¹⁸

¹⁶ Section 11505, subd. (c).

¹⁷ Section 81002, subd. (a).

¹⁸ Section 84200, *et seq.*

The Act defines a “candidate” as any elected officer, which includes an officeholder.¹⁹ At the core of the Act’s campaign reporting system is the requirement that candidates and committees must file campaign statements and reports for certain periods and by certain deadlines. The Act requires candidates and, if applicable, their controlled committees to file campaign statements at specific times disclosing information regarding contributions received and expenditures made by the campaign committees.²⁰

All candidates appearing on the ballot at the next election shall file preelection statements.²¹ For the period ending 45 days before the election, the statement shall be filed no later than 40 days before the election, and for the period ending 17 days before the election, the statement shall be filed no later than 12 days before the election.²²

Candidates who do not plan to raise or spend more than two thousand dollars during a calendar year are permitted to file an Officeholder and Candidate Campaign Statement - Short Form (“Form 470”) that takes the place of all required pre-election and semi-annual statements for the calendar year.²³ In order to avoid the obligation to file pre-election statements, a candidate would need to file the Form 470 on or before the first pre-election statement was due and not have an open controlled committee.²⁴

A candidate who has not filed a short form campaign statement (“Form 470”) and whose salary as an elected officer is \$200 or more a month must file a semi-annual statement by January 31 for the period ending December 31 of the previous year, and by July 31 for the period ending June 30.²⁵

SUMMARY OF THE EVIDENCE

Sanchez is a member of the Franklin-McKinley School District Board of Education. As a candidate, Sanchez was required to file a campaign statement to disclose campaign activity. Sanchez is now required to file semi-annual campaign statements as an officeholder for 2023, 2024, 2025, through 2026, when Sanchez’s term expires.

The Enforcement Division received a referral from the Santa Clara County Registrar of Voters (“ROV”) on November 22, 2022 regarding Sanchez’s failure to timely file a pre-election campaign statement in connection with the November 8, 2022 election, due on September 29, 2022. The ROV notified Sanchez in writing on October 3, 2022 and November 9, 2022, and called Sanchez on November 7, 2022. (Certification, Exhibit A-7.) On November 15, 2022, Sanchez filed a Form 470 covering the 2022 reporting period. (Certification, Exhibit A-8.)

¹⁹ Section 82007, subd (a).

²⁰ Section 84200, *et seq.*

²¹ Section 84200.5, subd. (a)(1).

²² Section 84200.8, subd. (a) and (b).

²³ Section 84206, subd. (a); Regulation 18406, subd. (a).

²⁴ Regulation 18406.

²⁵ Section 84200.

The ROV referred Sanchez again on September 22, 2023 for failing to timely file a campaign statement for the reporting period of January 1, 2023 through December 31, 2023, and notified Sanchez on August 4, 2023 and August 14, 2023. (Certification, Exhibit A-9.) The ROV sent notifications to Sanchez on August 8, 2024 and August 22, 2024 regarding the statement due for 2024 and referred Sanchez to Enforcement again on September 16, 2024. (Certification, Exhibit A-10.)

According to records maintained by the ROV, Sanchez has not filed any additional statements, as of October 24, 2025. Furthermore, according to the County, board members make roughly \$264.60 per month in stipends. (Certification, Exhibit A-11.)

According to records maintained by ROV²⁶ and the California Secretary of State²⁷, Sanchez did not have an open controlled committee during 2022 through present.

Summary of Contact

Overall, the Enforcement Division contacted Sanchez 14 times throughout this case, as follows:

- April 23, 2024: Letter from the Enforcement Division
- May 16, 2024: Email from the Enforcement Division
- July 10, 2024: Email from the Enforcement Division
- September 20, 2024: Email from the Enforcement Division
- November 19, 2024: Phone call and email from the Enforcement Division
- November 20, 2024: Email from the Enforcement Division
- December 5, 2024: Email from the Enforcement Division
- December 19, 2024: Email from the Enforcement Division
- March 17, 2025: Report in Support of Probable Cause served on Sanchez
- April 4, 2025: Email from the Enforcement Division.
- April 22, 2025: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served mailed to Sanchez
- June 16, 2025: Accusation served on Sanchez
- November 5, 2025: letter to Sanchez informing them that a Default Decision and Order would appear on the agenda for the November 20, 2025 Commission meeting as a notice item
- January 21, 2026: Notice of Intent to Enter Default Decision and Order to Sanchez informing them that the Default Decision and Order would be presented at the February 12, 2026 meeting for Commission action

²⁶ <https://public.netfile.com/pub2/?aid=SCC>

²⁷ <https://cal-access.sos.ca.gov/>

VIOLATIONS

Sanchez committed five violations of the Act as follows:

COUNT 1

Failure to Timely File a Preelection Campaign Statement

Sanchez had a duty to file a preelection campaign statement for the reporting period of January 1, 2022 through September 24, 2022 by the September 29, 2022 due date. Sanchez failed to timely file a pre-election campaign statement for the reporting period of January 1, 2022 through September 24, 2022 by the September 29, 2022 due date. By failing to timely file the preelection campaign statement by the September 29, 2022 due date, Sanchez violated Government Code Sections 84200.5 and 84200.8.

COUNT 2

Failure to Timely File a Semi-Annual Campaign Statement

Sanchez had a duty to file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due date. Sanchez failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due date. By failing to timely file the semi-annual campaign statement by the July 31, 2023 due date, Sanchez violated Government Code Section 84200.

COUNT 3

Failure to Timely File a Semi-Annual Campaign Statement

Sanchez had a duty to file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 30, 2023 by the January 31, 2024 due date. Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 30, 2023 by the January 31, 2024 due date. By failing to timely file the semi-annual campaign statement by the January 31, 2024 due date, Sanchez violated Government Code Section 84200.

COUNT 4

Failure to Timely File a Semi-Annual Campaign Statement

Sanchez had a duty to file a semi-annual campaign statement for the reporting period of January 1, 2024 through June 30, 2024 by the July 31, 2024 due date. Sanchez failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2024 through June 30, 2024 by the July 31, 2024 due date. By failing to timely file the semi-annual campaign statement by the July 31, 2024 due date, Sanchez violated Government Code Section 84200.

COUNT 5

Failure to Timely File a Semi-Annual Campaign Statement

Sanchez had a duty to file a semi-annual campaign statement for the reporting period of July 1, 2024 through December 31, 2024 by the January 31, 2025 due date. Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2024 through December 31, 2024 by the January 31, 2025 due date. By failing to timely file the semi-annual campaign statement by the January 31, 2025 due date, Sanchez violated Government Code Section 84200.

CONCLUSION

This matter consists of 5 counts of violating the Act, which carry a maximum total administrative penalty of \$25,000.²⁸

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.²⁹

Sanchez failed to timely file multiple required campaign statements as both a candidate and officeholder, spanning several reporting periods from 2022 through 2024, despite repeated written and verbal notifications from the Santa Clara County Registrar of Voters and the Enforcement Division. While Sanchez eventually filed a Form 470 for 2022, no further statements have been filed as of October 24, 2025.

The failure to disclose campaign-related activity undermines the public's right to transparency and trust in local elections and government, especially as the violations persist over multiple years causing harm to the public. As an elected official, Sanchez should have understood the obligations to file campaign statements. There is no direct evidence of intent to deceive; however, repeated failures following multiple reminders suggest a disregard for legal duties. The

²⁸ Section 83116, subd. (c).

²⁹ Regulation 18361.5, subd. (e).

pattern and duration of noncompliance point to negligence rather than inadvertence. Sanchez made no documented attempt to consult Commission staff or proactively address the issue beyond the single Form 470 filing. The ongoing pattern from 2022 to 2025 indicates a lack of corrective behavior. No amendments or corrective disclosures have been submitted voluntarily.

Based on these findings, a penalty is appropriate that addresses both the seriousness and repeated nature of the violations, while also acting as a deterrent to future noncompliance by public officials. Although the activity that should have been disclosed was likely minimal, the principles of transparency and accountability in public office are essential. Thus, a moderate to substantial penalty aligned with Commission precedent is appropriate to uphold the purposes of the Act.

Counts 1-5

- *In the Matter of Friends of Joe Aguirre for Delano City Council 2014 and Joe Aguirre*, FPPC No. 17/193. (The Commission approved a default decision on March 24, 2022). The respondents failed to timely file preelection and semi-annual campaign statements. The Commission imposed a penalty of \$5,000 for the preelection statements and \$4,000 per count for failure to timely file semi-annual statements.
 - A lower penalty than Aguirre is recommended for Count 1 (failure to timely file a preelection campaign statement). Unlike Aguirre, Sanchez had no committee or financial activity, significantly reducing the public harm. Aguirre engaged in campaign activity, including at least \$5,000 in expenditures, as evidenced by a 24-hour report. Aguirre did not file any preelection statements related to two different elections. Here, Sanchez's preelection violation relates to only one election. Although Sanchez filed a preelection statement (Form 470), the violation still undermined transparency because it was filed one week after the election. Thus, a penalty of \$2,500 is justified for Count 1.
 - A lower penalty than Aguirre is recommended for Counts 2 and 3 (failure to timely file semi-annual campaign statements). Here, Sanchez failed to file two semi-annual campaign statements in 2023, unrelated to an election, after being notified by the Registrar of Voters. In aggravation, these were consecutive failures, reflecting a pattern. However, it seems likely that Sanchez had no contributions, expenditures, or committee activity, contrasting with Aguirre's active campaign, open committee and multiple elections. Thus a penalty of \$1,500 per count is justified for Counts 2 and 3.
 - A lower penalty than Aguirre, but slightly higher penalty than Counts 2 and 3, is recommended for Counts 4 and 5. These violations represent the fourth and fifth consecutive missed filings by Sanchez. The continued pattern after filing officer outreach and enforcement referrals shows a clear disregard for filing obligations. Aguirre's violations were more severe due to the presence of campaign activity and longer history of Enforcement contact. Accordingly, a lower penalty for Sanchez than Aguirre is reasonable due to the absence of financial activity, but escalation is justified

due to repeated noncompliance. Thus, a penalty of \$2,000 per count is justified for Counts 4 and 5.

PROPOSED PENALTY

After considering the factors of Regulation 18361.5 and the penalties imposed in prior cases, the following penalties are proposed:

Counts	Violations: The Committee and Blakeley	Proposed Penalty per Count
1	Failure to Timely File Preelection Campaign Statement	\$2,500
2-3	Failure to Timely File Semi-Annual Campaign Statements	\$1,500
4-5	Failure to Timely File Semi-Annual Campaign Statements	\$2,000
	Total:	\$9,500



**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. 22/887; Steven Sanchez* 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 24, 2025

EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated March 13, 2025, USPS tracking, certified mail and return receipts

EXHIBIT A-3: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated April 22, 2025

EXHIBIT A-4: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated April 25, 2025

EXHIBIT A-5: Accusation, dated May 2, 2025

- EXHIBIT A-6: Proof of Service on June 6, 2025, for Accusation and accompanying documents from process server, dated May 14, 2025
- EXHIBIT A-7: Notifications from Santa Clara County on October 3, 2022 and November 9, 2022
- EXHIBIT A-8: Officeholder and Candidate Campaign Short Form, filed November 15, 2022
- EXHIBIT A-9: Letter from County of Santa Clara on August 4, 2023 and August 14, 2023
- EXHIBIT A-10: Letter from County of Santa Clara on August 8, 2024 and August 22, 2024
- EXHIBIT A-11: Email from County of Santa Clara regarding monthly stipend, stamped April 8, 2024
- EXHIBIT A-12: Notice of Default Decision and Order, dated November 5, 2025
- EXHIBIT A-13: Notice of Intent to Enter Default Decision and Order, dated February 5, 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 4, 2026, at Sacramento, California.



Joselyne Soto
Associate Governmental Program Analyst
Enforcement Division
Fair Political Practices Commission

Exhibit A-1

1 ANGELA J. BRERETON
Assistant Chief of Enforcement
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5 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission

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7 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

8 **STATE OF CALIFORNIA**

9
10 In the Matter of) FPPC Case No. 22/887
11)
12) **REPORT IN SUPPORT OF A FINDING OF**
STEVEN SANCHEZ) **PROBABLE CAUSE**
13)
14 Respondents.) Conference Date: TBA
15) Conference Time: TBA
16) Conference Location: Commission Offices
1102 Q Street, Suite 3050
Sacramento, CA 95811

17 **INTRODUCTION**

18 Respondent Steven Sanchez (“Sanchez”) was a successful candidate for the Franklin-McKinley
19 Elementary School Board in the November 8, 2022 General Election.

20 Sanchez violated the Political Reform Act (the “Act”),¹ by failing to timely file campaign
21 statements for years 2022, 2023, and 2024.
22
23
24

25
26 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 **SUMMARY OF THE LAW**

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

6 Jurisdiction

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

17 Standard for Finding Probable Cause

18 For the hearing officer to make a finding of probable cause, it is only necessary that they be
19 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act
20 has been violated.⁷ Probable cause may only be found if the Respondents were notified of the violations
21 at least 21 days prior to the hearing officer’s consideration of the alleged violations.⁸

22 Contents of the Probable Cause Report

23 _____
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).

⁷ Regulation 18361.4, subd. (a).

⁸ Section 83115.5.

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

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

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

9 One purpose of the Act is to promote transparency by ensuring that receipts and expenditures in
10 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper
11 practices are inhibited.¹² Along these lines, the Act includes a comprehensive campaign reporting
12 system.¹³ Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act
13 will be “vigorously enforced.”¹⁴

14 Duty to File Campaign Statements

15 The Act defines a “candidate” as any elected officer, which includes an officeholder.¹⁵ At the
16 core of the Act’s campaign reporting system is the requirement that candidates and committees must
17 file campaign statements and reports for certain periods and by certain deadlines. The Act requires
18 candidates and, if applicable, their controlled committees to file campaign statements at specific times
19 disclosing information regarding contributions received and expenditures made by the campaign
20 committees.¹⁶

23 ⁹ Regulation 18361.4, subd. (b).

24 ¹⁰ Section 81001, subd. (h).

25 ¹¹ Section 81003.

26 ¹² Section 81002, subd. (a).

27 ¹³ Sections 84200, *et seq.*

28 ¹⁴ Section 81002, subd. (f).

¹⁵ Section 82007, subd (a).

¹⁶ Section 84200, *et seq.*

1 Preelection Campaign Statements

2 All candidates appearing on the ballot at the next election appearing on the ballot for the next
3 election shall file preelection statements.¹⁷ For the period ending 45 days before the election, the
4 statement shall be filed no later than 40 days before the election, and for the period ending 17 days
5 before the election, the statement shall be filed no later than 12 days before the election.¹⁸

6 Short Form Campaign Statements

7 Candidates who do not plan to raise or spend more than two thousand dollars during a calendar
8 year are permitted to file an Officeholder and Candidate Campaign Statement - Short Form (“Form
9 470”) that takes the place of all required pre-election and semi-annual statements for the year.¹⁹ In
10 order to avoid the obligation to file pre-election statements, a candidate would need to file the Form
11 470 on or before the first pre-election statement was due and not have an open controlled committee.²⁰

12 Semi-Annual Campaign Statements

13 A candidate who has not filed a short form campaign statement (“Form 470”) and whose salary
14 as an elected officer is \$200 or more a month must file a semi-annual statement by January 31 for the
15 period ending December 31 of the previous year, and by July 31 for the period ending June 30.²¹

16 **SUMMARY OF THE EVIDENCE**

17 Sanchez is a member of the Franklin-McKinley School District Board of Education. As a
18 candidate, Sanchez was required to file a campaign statement to disclose campaign activity. Sanchez is
19 now required to file semi-annual campaign statements as an officeholder for 2023, 2024, 2025, through
20 2026, when Sanchez’s term expires.

21 The Enforcement Division received a referral from the Santa Clara County Registrar of Voters
22 (“ROV”) on November 22, 2022 regarding Sanchez’s failure to timely file a pre-election campaign
23

24 ¹⁷ Section 84200.5, subd. (a)(1).

25 ¹⁸ Section 84200.8, subd. (a) and (b).

26 ¹⁹ Section 84206, subd. (a); Regulation 18406, subd. (a).

27 ²⁰ Regulation 18406.

28 ²¹ Section 84200.

1 statement in connection with the election, due on September 29, 2022. The ROV notified Sanchez on
2 October 3, 2022; November 7, 2022; and November 9, 2022. On November 15, 2022, Sanchez filed a
3 Form 470 covering the 2022 reporting period.

4 The ROV referred Sanchez again on September 22, 2023 for failing to timely file a campaign
5 statement for the reporting period of January 1, 2023 through December 31, 2023, and notified Sanchez
6 on August 4, 2023 and August 14, 2023. The ROV sent notifications to Sanchez on August 8, 2024 and
7 August 22, 2024 regarding the statement due for 2024 and referred Sanchez to Enforcement again on
8 September 16, 2024.

9 On April 23, 2024, the Enforcement Division sent Sanchez a letter regarding the past due filing
10 for 2022, and sent numerous emails regarding subsequent due filings, on July 10, 2024; September 20,
11 2024; November 19, 2024; November 20, 2024; December 5, 2024; and December 19, 2024.
12 Enforcement also called and left a voicemail for Sanchez on November 19, 2024. Sanchez did not
13 respond.

14 According to records maintained by the ROV, Sanchez has not filed any additional statements,
15 as of February 20, 2025. Furthermore, according to the County, board members make roughly \$264.60
16 per month in stipends.

17 VIOLATIONS

18 Count 1: Failure to Timely File Preelection Campaign Statement

19 As a candidate, Stevens failed to timely file a pre-election campaign statement with the Santa
20 Clara County Registrar of Voters by the September 29, 2022 due date, in violation of Government Code
21 Sections 84200.5 and 84200.8.

22 Count 2: Failure to Timely File Semi-Annual Campaign Statement

23 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of
24 January 1, 2023 through June 30, 2023 by the July 31, 2023 due date, in violation of Government Code
25 Section 84200.

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

2 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1,
3 2023 through December 30, 2023 by the January 31, 2024 due date, in violation of Government Code
4 Section 84200.

5 Count 4: Failure to Timely File Semi-Annual Campaign Statement

6 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of
7 January 1, 2024 through June 30, 2024 by the July 31, 2024 due date, in violation of Government Code
8 Section 84200.

9 Count 5: Failure to Timely File Semi-Annual Campaign Statement

10 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1,
11 2024 through December 30, 2024 by the January 31, 2025 due date, in violation of Government Code
12 Section 84200.

13 **EXCULPATORY INFORMATION**

14 The Enforcement Division is not aware of any exculpatory information.

15 **OTHER RELEVANT EVIDENCE**

16 The Enforcement Division is not aware of any other relevant information.

17 **CONCLUSION**

18 Probable cause exists to believe that Steven Sanchez violated the Act as detailed above. The
19 Enforcement Division respectfully requests an order finding probable cause pursuant to Section
20 83115.5 and Regulation 18361.4.

21 Dated: February 24, 2025

22 Respectfully Submitted,

23 **FAIR POLITICAL PRACTICES COMMISSION**

24 

25 By: Angela J. Brereton
26 Assistant Chief
27 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 March 13, 2025, I served the following document(s):

1. Letter dated March 13, 2025, from Angela J. Brereton;
2. FPPC Case No. 22/887 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

Steven Sanchez


I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on March 13, 2025.



Katelyn Rader

Tracking Number:

Remove X

70192970000140277349

Copy

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

Latest Update

Your item was delivered to the front desk, reception area, or mail room at 1:26 pm on March 17, 2025 in SAN JOSE, CA 95112.

Get More Out of USPS Tracking:

USPS Tracking Plus[®]

Feedback

Delivered

Delivered, Front Desk/Reception/Mail Room

SAN JOSE, CA 95112

March 17, 2025, 1:26 pm

[See All 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



FAIR POLITICAL PRACTICES COMMISSION
1102 Q STREET, SUITE ~~100~~ 3050
SACRAMENTO, CALIFORNIA 95811

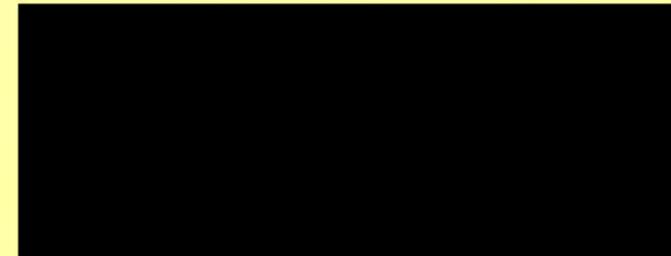


CERTIFIED MAIL®



7019 2970 0001 4027 7349

Steven Sanchez



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:
Steven Sanchez



9590 9402 9107 4225 2595 36

2. Article Number (Transfer from service label)

7019 2970 0001 4027 7349

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent

Received by (Printed Name) Addressee

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

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



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:
 Steven Sanchez
 [Redacted Address]



9590 9402 9107 4225 2595 36

2. Article Number (Transfer from service label)
 019 2970 0001 4027 7349

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Mary Fleming* Agent
 Addressee
 B. Received by (Printed Name) *Mary* C. Date of Delivery *3/17/26*
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

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

Domestic Return Receipt

USPS TRACKING#



9590 9402 9107 4225 2595 36

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

United States
 Postal Service

RECEIVED
 POLITICAL
 PRACTICES COMMISSION

25 APR -1 AM 8:27

• Sender: Please print your name, address, and ZIP+4® in this box®
 FPPC KR&SE
 1102 Q St., Suite 3050
 SAC, CA 95811

Exhibit A-3

1 ANGELA J. BRERETON
Assistant Chief of Enforcement
2 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
3 Sacramento, CA 95811
Telephone: (916) 322-5771
4 Email: abrebreton@fppc.ca.gov

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

6
7 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

8 **STATE OF CALIFORNIA**

9 In the Matter of) FPPC Case No. 22/887
10)
11 STEVEN SANCHEZ) EX PARTE REQUEST FOR A FINDING OF
12) PROBABLE CAUSE AND AN ORDER THAT
13 Respondent.) AN ACCUSATION BE PREPARED AND
SERVED
) Gov. Code § 83115.5

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

15 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)¹ and Regulation 18361.4,
16 Respondent Steven Sanchez (“Sanchez”) was served with copies of a Report in Support of a Finding of
17 Probable Cause (“PC Report”) in the above-entitled matter.² The PC Report, attached as “Exhibit A,”
18 was part of a packet of materials, including a cover letter, a memorandum describing probable cause
19 proceedings, and a probable cause checklist form, which was sent to Sanchez on March 13, 2025 by
20 certified mail, with return receipt requested, and was delivered on March 17, 2025. A copy of the proof
21 of service, USPS tracking confirmation, and return receipt is attached as “Exhibit B.”

22 In the cover letter, dated March 13, 2025, and the packet of materials, Sanchez was advised that
23 he could respond in writing to the PC Report and orally present the case to the Hearing Officer at a
24 probable cause conference to be held in Sacramento. Sanchez was further advised that in order to have a
25

26 ¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references
27 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.

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

1 probable cause conference, he needed to make a written request for one on or before 21 days of the date
2 he was served with the PC Report. Additionally, Sanchez was advised that if he did not request a
3 probable cause conference, such a conference would not be held, and probable cause would be
4 determined based solely on the PC Report, any written response by Sanchez and any rebuttal submitted
5 by the Enforcement Division. To date, Sanchez has not submitted a written response to the PC Report or
6 requested a probable cause conference.

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

10 **Count 1: Failure to Timely File Preelection Campaign Statetment**

11 As a candidate, Stevens failed to timely file a pre-election campaign statement with the Santa
12 Clara County Registrar of Voters by the September 29, 2022 due date, in violation of Government Code
13 Sections 84200.5 and 84200.8.

14 **Count 2: Failure to Timely File Semi-Annual Campaign Statement**

15 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of
16 January 1, 2023 through June 30, 2023 by the July 31, 2023 due date, in violation of Government Code
17 Section 84200.

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

19 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1,
20 2023 through December 30, 2023 by the January 31, 2024 due date, in violation of Government Code
21 Section 84200.

22 **Count 4: Failure to Timely File Semi-Annual Campaign Statement**

23 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of
24 January 1, 2024 through June 30, 2024 by the July 31, 2024 due date, in violation of Government Code
25 Section 84200.

1 **Count 5: Failure to Timely File Semi-Annual Campaign Statement**

2 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1,
3 2024 through December 30, 2024 by the January 31, 2025 due date, in violation of Government Code
4 Section 84200.

5 Additionally, after finding probable cause exists, the Enforcement Division requests an order by
6 the Hearing Officer that an accusation be prepared against Sanchez and served upon Sanchez ³

7 A copy of this Request was mailed via U.S. Mail to Sanchez on April 8, 2025 at the last known
8 address, as follows:

9 Steven Sanchez
10 [REDACTED]

11 Dated: April 22, 2025

Respectfully Submitted,

12 **FAIR POLITICAL PRACTICES COMMISSION**

13
14 

15 By: Angela J. Brereton
16 Assistant Chief
17 Enforcement Division

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26
27 _____
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. 2022-00887
5 STEVEN SANCHEZ)
6 Respondent.) FINDING OF PROBABLE CAUSE AND
7) ORDER TO PREPARE AND SERVE AN
8) ACCUSATION
9) Gov. Code § 83115.5
10)
11)

12 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 22, 2025, the Enforcement
14 Division submitted the above-entitled matter to the Hearing Officer for a determination of Probable
15 Cause. As set forth in the Ex Parte Request, the Enforcement Division served a Report in Support of a
16 Finding of Probable Cause (“PC Report”) on Respondent Steven Sanchez (“Sanchez”) on March 17,
17 2025 by certified mail, return receipt requested. Accompanying the PC Report was a packet of materials
18 that informed the Respondent of his right to file a written response to the PC Report and to request a
19 probable cause conference within 21 days following service of the PC Report, or transmittal of any
20 requested records by the Enforcement Division. During the 21 days that followed service of the PC
21 Report, Respondent did not file a response to the PC Report, request records, or request a probable cause
22 conference. Pursuant to California Code of Regulations title 2, section 18361.4,¹ determination of
23 probable cause may be made solely on papers submitted when the respondent does not request a
24 probable cause conference.

25 In making a probable cause determination, it is the duty of the Hearing Officer of the Fair
26 Political Practices Commission to determine whether probable cause exists to believe that a respondent
27 violated the Political Reform Act as alleged by the Enforcement Division in the PC Report served on the
28 respondent.

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

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

3 The PC Report served on Sanchez and the subsequent Ex Parte Request in this matter alleges five
4 violations of the Political Reform Act were committed, as follows:

5 Count 1: Failure to Timely File Preelection Campaign Statement

6 As a candidate, Sanchez failed to timely file a pre-election campaign statement with the Santa
7 Clara County Registrar of Voters by the September 29, 2022 due date, in violation of Government Code
8 Sections 84200.5 and 84200.8.

9 Count 2: Failure to Timely File Semi-Annual Campaign Statement

10 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of
11 January 1, 2023 through June 30, 2023 by the July 31, 2023 due date, in violation of Government Code
12 Section 84200.

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

14 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1,
15 2023 through December 30, 2023 by the January 31, 2024 due date, in violation of Government Code
16 Section 84200.

17 Count 4: Failure to Timely File Semi-Annual Campaign Statement

18 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of
19 January 1, 2024 through June 30, 2024 by the July 31, 2024 due date, in violation of Government Code
20 Section 84200.

21 Count 5: Failure to Timely File Semi-Annual Campaign Statement

22 Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1,
23 2024 through December 30, 2024 by the January 31, 2025 due date, in violation of Government Code
24 Section 84200.

25 ///

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

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

4 I therefore direct that the Enforcement Division issue an accusation against Sanchez in
5 accordance with this finding.

6 IT IS SO ORDERED.

7
8 4/25/2025

L. Karen Harrison

9 Dated: _____

10 Hearing Officer
11 Fair Political Practices Commission
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27 _____
28 ³ Government Code § 83115.5; Cal. Code Reg., tit. 2, §18361.4, subd. (c).

Exhibit A-5

1 ANGELA J. BRERETON
Assistant Chief of Enforcement
2 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q St, Suite 3050
3 Sacramento, CA 95811
Telephone: (916) 322-5771
4 Email: abrereton@fppc.ca.gov

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

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

10 In the Matter of:) FPPC No. 22/887
11)
12 STEVEN SANCHEZ) **ACCUSATION**
13 Respondents.)
14) (Gov. Code §11503)
15)
16)

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

19 **JURISDICTION**

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

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

27 ///

1 **B. Preelection Campaign Statements**

2 9. All candidates appearing on the ballot at the next election shall file preelection
3 statements.⁷ For the period ending 45 days before the election, the statement shall be filed no later than
4 40 days before the election, and for the period ending 17 days before the election, the statement shall be
5 filed no later than 12 days before the election.⁸

6 **C. Short Form Campaign Statements**

7 10. Candidates who do not plan to raise or spend more than two thousand dollars during a
8 calendar year are permitted to file an Officeholder and Candidate Campaign Statement - Short Form
9 (“Form 470”) that takes the place of all required pre-election and semi-annual statements for the
10 calendar year.⁹ In order to avoid the obligation to file pre-election statements, a candidate would need
11 to file the Form 470 on or before the first pre-election statement was due and not have an open
12 controlled committee.¹⁰

13 **D. Semi-Annual Campaign Statements**

14 11. A candidate who has not filed a short form campaign statement (“Form 470”) and whose
15 salary as an elected officer is \$200 or more a month must file a semi-annual statement by January 31
16 for the period ending December 31 of the previous year, and by July 31 for the period ending June 30.¹¹

17 **E. Factors to be Considered by the Fair Political Practices Commission**

18 12. In framing a proposed order following a finding of a violation pursuant to Government
19 Code Section 83116, the Commission and the administrative law judge shall consider all the
20 surrounding circumstances including but not limited to the following factors set forth in Regulation
21 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the
22 specific violation; (2) The level of experience of the violator with the requirements of the Political
23 Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence
24 or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate,

25
26 ⁷ Section 84200.5, subd. (a)(1).

⁸ Section 84200.8, subd. (a) and (b).

⁹ Section 84206, subd. (a); Regulation 18406, subd. (a).

¹⁰ Regulation 18406.

¹¹ Section 84200.

1 negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the
2 Commission staff or any other governmental agency in a manner not constituting complete defense
3 under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern
4 and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and
5 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide
6 full disclosure.¹²

7 **GENERAL FACTS**

8 13. Sanchez is a member of the Franklin-McKinley School District Board of Education. As
9 a candidate, Sanchez was required to file a campaign statement to disclose campaign activity. Sanchez
10 is now required to file semi-annual campaign statements as an officeholder for 2023, 2024, 2025,
11 through 2026, when Sanchez’s term expires.

12 14. The Enforcement Division received a referral from the Santa Clara County Registrar of
13 Voters (“ROV”) on November 22, 2022 regarding Sanchez’s failure to timely file a pre-election
14 campaign statement in connection with the November 8, 2022 election, due on September 29, 2022. The
15 ROV notified Sanchez on October 3, 2022; November 7, 2022; and November 9, 2022. On November
16 15, 2022, Sanchez filed a Form 470 covering the 2022 reporting period.

17 15. The ROV referred Sanchez again on September 22, 2023 for failing to timely file a
18 campaign statement for the reporting period of January 1, 2023 through December 31, 2023, and
19 notified Sanchez on August 4, 2023 and August 14, 2023. The ROV sent notifications to Sanchez on
20 August 8, 2024 and August 22, 2024 regarding the statement due for 2024 and referred Sanchez to
21 Enforcement again on September 16, 2024.

22 16. On April 23, 2024, the Enforcement Division sent Sanchez a letter regarding the past due
23 filing for 2022, and sent numerous emails regarding subsequent due filings, on July 10, 2024; September
24 20, 2024; November 19, 2024; November 20, 2024; December 5, 2024; and December 19, 2024.
25 Enforcement also called and left a voicemail for Sanchez on November 19, 2024. Sanchez did not
26 respond.

27
28

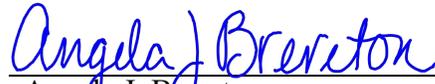
¹² Regulation 18361.5, subdivision (e).

- 1 2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order Sanchez to pay a monetary penalty of up to \$5,000 for the violation of the Political
3 Reform Act alleged in **Count 1**;
- 4 3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order Sanchez to pay a monetary penalty of up to \$5,000 for the violation of the Political
6 Reform Act alleged in **Count 2**;
- 7 4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order Sanchez to pay a monetary penalty of up to \$5,000 for the violation of the Political
9 Reform Act alleged in **Count 3**;
- 10 5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order Sanchez to pay a monetary penalty of up to \$5,000 for the violation of the Political
12 Reform Act alleged in **Count 4**;
- 13 6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order Sanchez to pay a monetary penalty of up to \$5,000 for the violation of the Political
15 Reform Act alleged in **Count 5**;
- 16 7. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
17 order Sanchez to file the outstanding campaign statements alleged in **Counts 2-5**.
- 18 8. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision
19 (e), consider the following factors in framing a proposed order following a finding of a
20 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
21 by the specific violation; (2) The level of experience of the violator with the requirements
22 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
23 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
24 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
25 violator demonstrated good faith by consulting the Commission staff or any other
26 governmental agency in a manner not constituting complete defense under Government
27 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
28 whether the violator has a prior record of violations of the Political Reform Act or similar

1 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
2 amendments to provide full disclosure.

3 9. That the Fair Political Practices Commission grant such other and further relief as it deems
4 just and proper.

5
6
7 Dated: 5/2/2025



8 _____
9 Angela J. Brereton,
10 Assistant Chief of Enforcement
11 Fair Political Practices Commission
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28

Exhibit A-6

ATTORNEY OR PARTY WITHOUT ATTORNEY: ANGELA BRERETON ASSISTANT CHIEF OF ENFORCEMENT ; JENNA RINEHART, SENIOR COMMISSION COUNSEL FAIR POLITICAL PRACTICES COMMISSION 1102 Q STREET, SUITE #3050 SACRAMENTO, CA 95811 TELEPHONE NO.: (279) 237-5946 FAX NO.: (916) 322-1932 ATTORNEY FOR:	FOR COURT USE ONLY
BEFORE THE FAIR POLITICAL PRACTICES COMMISSION STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
IN THE MATTER OF: Steven Sanchez :	CASE NUMBER: 22/887
PROOF OF SERVICE	Ref. No. or File No.: Steven Sanchez

1. I am over 18 years of age and not a party to this action.
2. Received by AAA Attorney Services II, Inc. on 5/5/2025 at 11:19 am to be served on **STEVEN SANCHEZ**, [REDACTED]
3. **SUBSTITUTE** served by delivering a true copy of the **ACCUSATION** with the date and hour of service endorsed thereon by me, to: **GEORGE SANCHEZ** as **OCCUPANT / PARENT** at the address of: [REDACTED] the within named person's usual place of **Abode**, who resides therein, who is eighteen (18) years of age or older and informed said person of the contents therein, in compliance with state statutes.
4. Date and Time of service: 5/10/2025 at 12:37 pm
5. Additional Information pertaining to this service:
05/07/2025 8:01 PM Attempted Service. NO ANSWER AT RESIDENCE (N/A), LIGHTS ON INSIDE
05/09/2025 8:08 AM Attempted Service. NO ANSWER AT RESIDENCE (N/A), NO ACTIVITY, NO VEHICLES
05/10/2025 12:37 PM SUBJECT NOT AVAILABLE FOR SERVICE, SUBSTITUTE SERVED
06/06/2025 4:27 PM DOCUMENTS MAILED TODAY 6-6-25 @ 4:27PM FROM ORANGE, CA
6. I am an independent contractor of a registered California process server.
7. My name, address, telephone number, and, if applicable, county of registration and number are:
Name: Kathryn Paz
Firm: AAA Attorney Services II, Inc.
Address: 714 W. Olympic Blvd., Ste. 638, Los Angeles, CA 90015
Telephone number: (213) 746-8010
Registration Number: 1127
County: SANTA CLARA COUNTY
The fee for the service was: \$100.40

IN THE MATTER OF: Steven Sanchez

:

CASE NUMBER:

22/887

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

Date: 5/14/25

Kathryn Paz

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



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

Exhibit A-7

County of Santa Clara

Registrar of Voters

1555 Berger Drive, Bldg. 2
San Jose, CA 95112
Mailing Address: P.O. Box 611360, San Jose, CA 95161-1360
(408) 299-VOTE (8683) (866) 430-VOTE (8683) FAX: (408) 998-7314
www.sccvote.org



10/3/2022

Sanchez, Steven

Re: Non-Filer Notification for Sanchez, Steven

Dear Sanchez, Steven:

Our records indicate that your campaign statement, FPPC 470, due on 9/29/2022 has not been filed electronically in accordance with County of Santa Clara Ordinance No. NS-300.857. The statement covers the following period 1/1/2022 - 12/31/2022.

If you believe you have received this notice in error, please contact us immediately; otherwise, please login to your NetFile account at <https://netfile.com/filer> to submit your electronic campaign disclosure statement filing.

County of Santa Clara Ordinance No. NS-300-857, Code Section A11-11 – Penalties for late filing states..."Any person who files an electronic copy of a statement or report required by this article after the deadline imposed by the California Political Reform Act for filing the written copy of the statement or report **shall be liable** in the same amount and on the same terms as set forth in the Act for late filing of the written copy of the campaign statement or report, **except that no fines shall be waived by the Registrar of Voters.**

The Political Reform Act does not allow an extension of state-mandated deadlines. Any person who files a statement after the deadline shall, in addition to other penalties or remedies established by the Political Reform Act, be liable in the amount of \$10 per day after the deadline until the statement is filed. The liability is limited to the cumulative amount of the contributions or expenditures for the period covered by the late statement or \$100, whichever is greater.

Your immediate attention to this matter is required. Failure to file campaign statements by the end of the 10-day grace period will result in referral to the District Attorney's (DA) office and Fair Political Practices Commission's (FPPC) Enforcement Division, as required by the Political Reform Act on 9/29/2022.

If you have any questions or need assistance, please contact us at (408) 299-8639.

Thank you,

Bren Lehr, MMC
Elections Division Coordinator, Candidate Services Division Manager

County of Santa Clara

Registrar of Voters

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www.sccvote.org



~~10/3/2022~~

11/9/22

Sanchez, Steven

Re: Non-Filer Notification for Sanchez, Steven

Dear Sanchez, Steven:

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If you believe you have received this notice in error, please contact us immediately; otherwise, please login to your NetFile account at <https://netfile.com/filer> to submit your electronic campaign disclosure statement filing.

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If you have any questions or need assistance, please contact us at (408) 299-8639.

Thank you,

Bren Lehr, MMC
Elections Division Coordinator, Candidate Services Division Manager

Exhibit A-8

**Officeholder and Candidate
Campaign Statement –
Short Form**

SCC-114114

Date of election if applicable:
(Month, Day, Year)

11/8/2022

Amendment (Explain Below)

FILE
Date Stamp
NOV 15 2022
REGISTRAR OF VOTERS
COUNTY OF SANTA CLARA
By RM Deputy

CALIFORNIA FORM 470
For Official Use Only

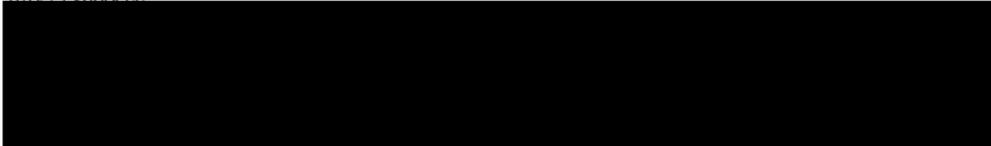
1. Statement Covers Calendar Year 20 22

2. Officeholder or Candidate Information

NAME OF OFFICEHOLDER OR CANDIDATE

STEVEN SANCHEZ

STREET ADDRESS



AREA CODE/DAYTIME PHONE NUMBER

OPTIONAL: FAX / E-MAIL ADDRESS

3. Office Sought or Held

OFFICE SOUGHT OR HELD

GOVERNING BOARD MEMBER

JURISDICTION (LOCATION)

FRANKLIN MCKINLEY SCHOOL DIST.

DISTRICT NUMBER
(IF APPLICABLE)

4. Committee Information

List all committees of which you have knowledge that are primarily formed to receive contributions or to make expenditures on behalf of your candidacy.

COMMITTEE NAME AND I.D. NUMBER	COMMITTEE ADDRESS	NAME OF TREASURER

5. Verification

I declare under penalty of perjury that to the best of my knowledge I anticipate that I will receive less than \$2,000 and that I will spend less than \$2,000 during the calendar year and that I have used all reasonable diligence in preparing this statement. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 11/15/22
DATE

By [Signature]
SIGNATURE OF OFFICEHOLDER OR CANDIDATE

Exhibit A-9

County of Santa Clara

Registrar of Voters

1555 Berger Drive, Bldg. 2
San Jose, CA 95112
Mailing Address: P.O. Box 611360, San Jose, CA 95161-360
(408) 299-VOTE (8683) (866) 430-VOTE (8683) FAX: (408) 998-7314
www.sccvote.org



8/4/2023

Steven Sanchez

RE: Non-Filer Notification for Sanchez, Steven

Dear Steven Sanchez:

A campaign disclosure statement covering the reporting period of 1/1/2023 - 12/31/2023* was not received by our office in accordance with County of Santa Clara Ordinance No. NS-300.857 by the 7/31/2023 deadline set by the Fair Political Practices Commission.

If you believe you have received this notice in error, please contact us immediately; otherwise, please login to your NetFile account at <https://netfile.com/filer> to submit your electronic campaign disclosure statement filing.

County of Santa Clara Ordinance No. NS-300-857, Code Section A11-11 – Penalties for late filing states... "Any person who files an electronic copy of a statement or report required by this article after the deadline imposed by the California Political Reform Act for filing the written copy of the statement or report **shall be liable** in the same amount and on the same terms as set forth in the Act for late filing of the written copy of the campaign statement or report, **except that no fines shall be waived by the Registrar of Voters.**

The Political Reform Act does not allow an extension of state-mandated deadlines. Any person who files a statement after the deadline shall, in addition to other penalties or remedies established by the Political Reform Act, be liable in the amount of \$10 per day after the deadline until the statement is filed. The liability is limited to the cumulative amount of the contributions or expenditures for the period covered by the late statement or \$100, whichever is greater.

Your immediate attention to this matter is required. Failure to file campaign statements by the end of the 10-day grace period will result in referral to the District Attorney's (DA) office and Fair Political Practices Commission's (FPPC) Enforcement Division, as required by the Political Reform Act.

Should you have any questions or need assistance, please contact our staff at (408) 299-8639 or by email at candidateservices@rov.sccgov.org.

Thank you,

Bren Lehr, MMC
Elections Division Coordinator, Candidate Services Division Manager

**If the committee filed pre-election statements during the last election cycle, the reporting period for the semi-annual statement will be 10/23/2022 - 12/31/2022.*

County of Santa Clara

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www.sccvote.org



8/14/2023

Steven Sanchez
[REDACTED]

RE: Annual Form 470 Campaign Filing Requirement-**2nd Notice**

Dear Steven Sanchez:

Our records indicate that your Annual Form 470 has not been filed with our office. This letter serves as notification that you must file an Annual Form 470 Campaign Statement with our office no later than 7/31/2023. The period covered for this statement is 1/1/2023 through 12/31/2023.

Please note that the Political Reform Act does not allow an extension of state-mandated deadlines. Any person who files a statement after the deadline shall, in addition to other penalties or remedies established by the political Reform Act, be liable in the amount of \$10 per day after the deadline until the statement is filed. (GC § 91013)

Failure to file a Form 470 will result in referral to the Fair Political Practices Commission's Enforcement Division, as required by the Political Reform Act.

If you have questions or feel this notification was sent in error, please do not hesitate to contact our office at (408) 299-8639.

Sincerely,

Bren Lehr, MMC
Elections Division Coordinator, Candidate Services Division Manager

Exhibit A-10

County of Santa Clara

Registrar of Voters

1555 Berger Drive, Bldg. 2
San Jose, CA 95112
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(408) 299-VOTE (8683) (866) 430-VOTE (8683) FAX: (408) 998-7314
www.sccvote.org



8/8/2024

Steven Sanchez

RE: 1st Non-Filer Notification for Annual Form 470 Campaign Filing Requirement - Steven Sanchez

Dear Steven Sanchez

An officeholder campaign disclosure statement covering the reporting period of 1/1/2024 - 12/31/2024* was not received by our office in accordance with County of Santa Clara Ordinance No. NS-300.857 by the 7/31/2024 deadline set by the Fair Political Practices Commission.

If you believe you have received this notice in error, please contact us immediately; otherwise, please login to your NetFile account at <https://netfile.com/filer> to submit your electronic campaign disclosure statement filing.

County of Santa Clara Ordinance No. NS-300-857, Code Section A11-11 – Penalties for late filing states...”Any person who files an electronic copy of a statement or report required by this article after the deadline imposed by the California Political Reform Act for filing the written copy of the statement or report **shall be liable** in the same amount and on the same terms as set forth in the Act for late filing of the written copy of the campaign statement or report, **except that no fines shall be waived by the Registrar of Voters.**

Please note that the Political Reform Act does not allow an extension of state-mandated deadlines. Any person who files a statement after the deadline shall, in addition to other penalties or remedies established by the political Reform Act, be liable in the amount of \$10 per day after the deadline until the statement is filed. (GC § 91013)

Failure to file a Form 470 will result in referral to the Fair Political Practices Commission's Enforcement Division, as required by the Political Reform Act.

If you have questions or feel this notification was sent in error, please do not hesitate to contact our office at (408) 299-8639.

Sincerely,

Election Specialists
Candidate Services Division

County of Santa Clara

Registrar of Voters

1555 Berger Drive, Bldg. 2
San Jose, CA 95112
Mailing Address: P.O. Box 611360, San Jose, CA 95161-360
(408) 299-VOTE (8683) (866) 430-VOTE (8683) FAX: (408) 998-7314
www.sccvote.org



8/22/2024

Steven Sanchez

RE: **2nd** Non-Filer Notification for Annual Form 470 Campaign Filing Requirement - Sanchez, Steven

Dear Steven Sanchez:

An officeholder campaign disclosure statement covering the reporting period of 1/1/2024 - 12/31/2024* was not received by our office in accordance with County of Santa Clara Ordinance No. NS-300.857 by the 7/31/2024 deadline set by the Fair Political Practices Commission.

If you believe you have received this notice in error, please contact us immediately; otherwise, please login to your NetFile account at <https://netfile.com/filer> to submit your electronic campaign disclosure statement filing.

County of Santa Clara Ordinance No. NS-300-857, Code Section A11-11 – Penalties for late filing states...”Any person who files an electronic copy of a statement or report required by this article after the deadline imposed by the California Political Reform Act for filing the written copy of the statement or report **shall be liable** in the same amount and on the same terms as set forth in the Act for late filing of the written copy of the campaign statement or report, **except that no fines shall be waived by the Registrar of Voters.**

Please note that the Political Reform Act does not allow an extension of state-mandated deadlines. Any person who files a statement after the deadline shall, in addition to other penalties or remedies established by the political Reform Act, be liable in the amount of \$10 per day after the deadline until the statement is filed. (GC § 91013)

Failure to file a Form 470 will result in referral to the Fair Political Practices Commission's Enforcement Division, as required by the Political Reform Act.

If you have questions or feel this notification was sent in error, please do not hesitate to contact our office at (408) 299-8639.

Sincerely,

Election Specialists
Candidate Services Division

Exhibit A-11

Aguilar, Margaret L

From: Santa Clara County <do-not-reply@isd.sccgov.org>
Sent: Monday, April 8, 2024 10:53 AM
To: ROV - CSD
Subject: [EXTERNAL] Stipend Reporting Form

Submitted on Mon, 04/08/2024 - 10:52

Submitted by: Anonymous

Submitted values are:

Name of District Representative
Cathe Mati

Name of District
Franklin-McKinley School District

Phone
4082836006

Email
cathe.mati@fmsd.org

Provide the amount of compensation paid to each board member monthly.
\$264.60

FILED

APR 08 2024

REGISTRAR OF VOTERS
COUNTY OF SANTA CLARA
By: CL Deputy

Exhibit A-12



November 5, 2025

Steven Sanchez
[REDACTED]

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC No. 2022-00887; In the Matter of Steven Sanchez

Dear Steven Sanchez:

On June 16, 2025, you were personally served with an accusation 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 **November 20, 2025**. 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 \$9,500 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.

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 (916) 322-5771 or abreron@fppc.ca.gov if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

Angela J. Brereton

Angela J. Brereton
Assistant Chief of Enforcement
Enforcement Division

¹ Government Code section 11505.

Exhibit A-13



CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811 • (916) 322-5660

February 5, 2026

Steven Sanchez
[REDACTED]

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC No. 2022-00887; In the Matter of Steven Sanchez

Dear Steven Sanchez:

On June 16, 2025, you were personally served with an accusation 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 **November 20, 2025**. The Commission will be asked to adopt the Default at its public meeting scheduled for **March 19, 2026** and impose an administrative penalty of \$9,500 against you. A copy of the Default, Decision, and Order and accompanying exhibits the Commission will consider at its meeting on **March 19, 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.

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 (916) 322-5771 or abreron@fppc.ca.gov if you wish to enter into a negotiated settlement.

¹ Government Code Section 11505.

Sincerely,

Angela J. Brereton

Angela J. Brereton
Assistant Chief of Enforcement
Enforcement Division

Enclosures: Default Decision and Order, Exhibit 1 and attachments