

1 KENDALL L.D. BONEBRAKE
Chief of Enforcement
2 KRISTIN E. GOULET
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
4 Sacramento, CA 95811
5 Telephone: (279) 237-5986
kgoulet@fppc.ca.gov

6 Attorneys for Complainant

8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

9 STATE OF CALIFORNIA

10
11 In the Matter of) FPPC Case No.: 2024-00816
12)
13 THARA INNOCENT,) DEFAULT DECISION AND
14) ORDER
15 Respondent.) (Government Code Sections 11506
16) and 11520)

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 Thara Innocent (“Innocent”) 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, Thara Innocent (“Innocent”), was a Recreation Coordinator for the City of Los Angeles Department of Recreation and Parks (“Rec and Parks”) from October 28, 2018 until November 25, 2024. 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, Innocent 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”).

Innocent, 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, a 2023 Annual SEI by the April 2, 2024 due date, and a Leaving Office SEI by the December 26, 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

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.

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 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-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 Innocent in this matter by serving them with a Report in Support of

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.

a Finding of Probable Cause (the “Report”) by certified mail.¹² (Certification, Exhibit A-1.) Innocent was served with the Report on February 21, 2025. (Certification, Exhibit A-2.) The administrative action commenced on February 21, 2025, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on Innocent 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. Innocent 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 Innocent 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 14, 2025, the Hearing Officer, Legal Division, L. Karen Harrison, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Innocent. (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 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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¹² Section 83115.5.

¹³ 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 11507.7.¹⁴ The APA also sets forth the language required in the accompanying statement to the respondent.¹⁵

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 June 9, 2025, the Commission's Assistant Chief of Enforcement, Angela J. Brereton, issued an Accusation against Innocent. (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 Innocent by substituted service, pursuant to California Code Civil Procedure Section 415.20, subdivision (a), which was deemed completed on October 18, 2025. (Certification, Exhibit A-6.)

Along with the Accusation, the Enforcement Division served Innocent 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. Innocent did not file a Notice of Defense within the statutory time period, which ended on November 3, 2025.¹⁷

As a result, on December 30, 2025, the Enforcement Division sent a letter to Innocent 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 3, 2026, the Enforcement Division sent another letter to Innocent 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.

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¹⁴ Section 11505, subd. (a).

¹⁵ Section 11505, subd. (b).

¹⁶ Section 11505, subd. (c).

¹⁷ The fifteenth day after October 18, 2025 was November 2, 2025, a Sunday, so the due date for Innocent's response to the Accusation was the next business day, November 3, 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.¹⁸ Another purpose is to provide adequate enforcement mechanisms so that the Act will be “vigorously enforced.”¹⁹

The Act requires every state and local agency to develop a Conflict of Interest Code.²⁰ 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.²¹ 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.²²

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,²³ all designated employees shall annually file statements no later than April 1,²⁴ and all persons leaving designated positions shall file statements within 30 days after leaving the designated positions.²⁵ 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.²⁶ Any person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per violation.²⁷

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,

¹⁸ Section 81002, subd. (c).

¹⁹ Section 81002, subd. (f).

²⁰ Section 87300.

²¹ Section 87302, subd. (a).

²² Section 87300.

²³ Regulation 18730, subd. (b)(5)(A).

²⁴ Regulation 18730, subd. (b)(5)(C).

²⁵ Regulation 18730, subd. (b)(5)(D).

²⁶ Section 81005.

²⁷ 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-11 and incorporated herein by reference.

Innocent was a Recreation Coordinator for the Rec and Parks from October 28, 2018 until November 25, 2024. 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, Innocent is considered to have assumed the position of Recreation Coordinator along with its corresponding filing obligations on April 22, 2020.

Innocent was required to timely file the Assuming Office SEI by the May 22, 2020 due date.

On or around April 23, 2020, the Filing Officer notified Innocent of their duty to file the Assuming Office SEI (Certification, Exhibit A-7.)

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

The Filing Officer made multiple attempts to notify Innocent of their duty to file the 2020 Annual SEI. Between February 25, 2021 and on or around July 7, 2021, the Filing Officer notified Innocent five times via email of the obligation to file. (Certification, Exhibit A-8.) On December 20, 2021, after not receiving compliance from Innocent, the Filing Officer referred the matter to the Commission's Enforcement Division.

Innocent was required to timely file the 2021 Annual SEI by the April 1, 2022 due date.

On or around June 29, 2022 and August 25, 2022, the Filing Officer contacted Innocent via email to remind Innocent of their duty to file the 2021 Annual SEI (Certification, Exhibit A-9.)

Innocent was required to timely file the 2022 Annual SEI by the April 3, 2023 due date.

On or around July 19, 2023 and September 21, 2023, the Filing Officer contacted Innocent via email to remind Innocent of their duty to file the 2022 Annual SEI (Certification, Exhibit A-10.)

Innocent was required to timely file the 2023 Annual SEI by the April 2, 2024 due date.

On or around August 5, 2024 and October 15, 2024, the Filing Officer contacted Innocent via email to remind Innocent of their duty to file the 2022 Annual SEI (Certification, Exhibit A-11.)

Innocent was required to timely file the Leaving Office SEI by the December 26, 2024 due date.

To date, Innocent has not filed any of the outstanding SEIs.

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

Type of SEI	Due Date	Date Filed
Assuming Office	5/22/2020	Not filed
2020 Annual	4/1/2021	Not filed
2021 Annual	4/1/2022	Not filed
2022 Annual	4/3/2023	Not filed
2023 Annual	4/2/2024	Not filed
Leaving Office	12/26/2024	Not filed

Summary of Contact

Overall, the Commission contacted Innocent 12 times throughout this case, as follows:

- August 14, 2024: email from Enforcement Division regarding outstanding SEIs
- August 27, 2024: two emails from Enforcement Division regarding outstanding SEIs
- August 28, 2024: email from Enforcement Division regarding outstanding SEIs
- September 4, 2024: email from Enforcement Division regarding outstanding SEIs
- September 23, 2024: email from Enforcement Division regarding outstanding SEIs
- September 25, 2024: email from Enforcement Division regarding outstanding SEIs
- February 21, 2025: Report in Support of a Finding of Probable Cause was served on Innocent via certified mail
- 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 Innocent via U.S. Mail
- July 1, 2025: call from Enforcement Division regarding outstanding SEIs
- October 18, 2025: substituted service of Accusation was completed
- December 30, 2025: letter to Innocent 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 Innocent informing them that the Default Decision and Order would be presented at the March 19, 2026 meeting for Commission action

VIOLATIONS

Innocent committed six violations of the Act as follows:

COUNT 1

Failure to Timely File Assuming Office SEI

Innocent 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, Innocent violated Government Code Section 87300.

COUNT 2

Failure to Timely File 2020 Annual SEI

Innocent 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, Innocent violated Government Code Section 87300.

COUNT 3

Failure to Timely File 2021 Annual SEI

Innocent 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, Innocent violated Government Code Section 87300.

COUNT 4

Failure to Timely File 2022 Annual SEI

Innocent 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, Innocent violated Government Code Section 87300.

COUNT 5

Failure to Timely File 2023 Annual SEI

Innocent 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, Innocent violated Government Code Section 87300.

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COUNT 6

Failure to Timely File Leaving Office SEI

Innocent had a duty to timely file the Leaving Office SEI by the December 26, 2024 due date. By failing to timely file the Leaving Office SEI, Innocent violated Government Code Section 87300.

CONCLUSION

This matter consists of six counts of violating the Act, which carry a maximum total administrative penalty of \$30,000.²⁸

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

In this matter, Innocent failed to timely file the Assuming Office SEI, four Annual SEIs, and the Leaving Office SEI for their position as Recreation Coordinator with Rec 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 a potential conflict of interest regarding decisions they make in their official capacity. All six SEIs remain outstanding. Innocent's violations deprived the public of important and timely information regarding Innocent's economic interests

Innocent has no prior record of violations of the Act for SEI violations. Innocent is also no longer 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.

²⁸ Section 83116, subd. (c).

²⁹ Regulation 18361.5, subd. (e).

Counts 1-6

- *In the Matter of Jeffrey Williams*, FPPC No. 22/007. (The Commission approved a default decision on February 13, 2025). The respondent failed to timely file five SEIs. At the time of the default, respondent was still in office and all of the SEIs remained outstanding. The respondent did not have any prior enforcement history. The Commission imposed a penalty of \$4,500 per count, \$22,500 in total for these violations.

Here, just as in *Williams*, Innocent failed to timely file six SEIs and all SEIs remain outstanding. Innocent also does not have prior enforcement history. However, unlike the respondent in *Williams*, Innocent is no longer in office at the time of the default. Therefore, a lower default penalty amount of \$4,000 per count is recommended.

PROPOSED PENALTY

After considering the factors of Regulation 18361.5 and the penalties imposed in prior cases, a penalty of \$4,000 per count, for a total penalty of \$24,000, 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. 2024-00816; Thara Innocent* 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 18, 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, signed return receipt, 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 14, 2025

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

- EXHIBIT A-6: Proof of Service for Accusation and accompanying documents on October 8, 2025 from process server, dated October 8, 2025
- EXHIBIT A-7: Notification from Filing Officer regarding Assuming Office Statement of Economic Interests
- EXHIBIT A-8: Notifications from Filing Officer regarding 2020 Annual Statement of Economic Interests
- EXHIBIT A-9: Notifications from Filing Officer regarding 2021 Annual Statement of Economic Interests
- EXHIBIT A-10: Notifications from Filing Officer regarding 2022 Annual Statement of Economic Interests
- EXHIBIT A-11: Notifications from Filing Officer regarding 2023 Annual Statement of Economic Interests
- EXHIBIT A-12: Notice of Default Decision and Order, dated December 31, 2025
- EXHIBIT A-13: 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 ANGELA J. BRERETON
Assistant Chief of Enforcement
2 KRISTIN E. GOULET
Commission Counsel, Enforcement Division
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
Sacramento, CA 95811
4 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**

10 In the Matter of) FPPC No. 2024-00816
11)
12) **REPORT IN SUPPORT OF A FINDING OF**
13) **PROBABLE CAUSE**
14 THARA INNOCENT,)
15 Respondent.) Conference Date: TBA
16) Conference Time: TBA
17) Conference Location: Commission Offices
18) 1102 Q Street, Suite 3050
19) Sacramento, CA 95811
20)

21 **INTRODUCTION**

22 Respondent, Thara Innocent (“Innocent”), assumed the position of Recreation Coordinator for the
23 City of Los Angeles Department of Recreation and Parks on April 22, 2020. As of the date of this report,
24 Innocent is no longer serving with the City of Los Angeles Department of Recreation and Parks. She left
25 her position on November 25, 2024.

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

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 their agency’s Conflict of Interest Code and the Fair Political Practices Commission’s regulations.
2 Gonzalez, a designated official, violated the Act by failing to timely file an Assuming Office SEI by the
3 May 22, 2020 deadline, a 2020 Annual SEI by the April 1, 2021 deadline, a 2021 Annual SEI by the
4 April 1, 2022 deadline, and a 2022 Annual SEI by the April 3, 2023 deadline, a 2023 Annual SEI by the
5 April 2, 2024 deadline, and a Leaving Office SEI by the December 26, 2024 deadline.

6 **SUMMARY OF THE LAW**

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

11 **Jurisdiction**

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

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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).

1 **Standard for Finding Probable Cause**

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

6 **Contents of the Probable Cause Report**

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

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

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

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

18 **Conflict of Interest Codes**

19 The Act requires every state and local agency to develop a Conflict of Interest Code.¹⁴ These
20 codes must designate those officials who participate in making decisions which may foreseeably have a
21 material financial effect on any financial interest belonging to that official and require those designated
22

23 ⁷ Regulation 18361.4, subd. (a).

24 ⁸ Section 83115.5.

25 ⁹ Regulation 18361.4, subd. (b).

26 ¹⁰ Section 81001, subd. (h).

27 ¹¹ Section 81003.

28 ¹² Section 81002, subd. (c).

¹³ Section 81002, subd. (f).

¹⁴ Section 87300.

officials to disclose all reportable interests on SEIs.¹⁵ 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.¹⁶

Regulation 18730 and Liability for Violation

Regulation 18730 outlines the timing for disclosing the designated employees’ economic interests as follows: All persons assuming designated positions shall file statements within 30 days after assuming the designated positions¹⁷; all designated employees shall annually file statements no later than April 1¹⁸; and all designated employees who leave the designated positions shall file statements within 30 days after leaving office.¹⁹ Any person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per violation.²⁰

Filing Deadline on Weekend or Holiday

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

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

Recreation Coordinators for the City of Los Angeles Department of Recreation and Parks are required 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.²² Recreation Coordinators are also required to disclose all interests

¹⁵ Section 87302, subd. (a).

¹⁶ Section 87300.

¹⁷ Regulation 18730, subd. (b)(5)(B).

¹⁸ Regulation 18730, subd. (b)(5)(C).

¹⁹ Regulation 18730, subd. (b)(5)(D).

²⁰ Sections 83116 and 83116.5.

²¹ Section 81005.

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

1 in real property involved in an enforcement, regulatory, legislative, permitting, licensing, or contractual
2 decision made or pending by the Recreation Coordinator’s division.²³

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

6 **SUMMARY OF THE EVIDENCE**

7 Innocent served as a Recreation Coordinator for the City of Los Angeles Department of
8 Recreation and Parks beginning on October 28, 2018 and she left the position on November 25, 2024,
9 according to the records kept by the Los Angeles City Ethics Commission. The position of Recreation
10 Coordinator was added as a designated position to the City of Los Angeles Department of Recreation and
11 Parks’ Conflict of Interest Code beginning on April 22, 2020. As such, Innocent is considered to have
12 assumed the position of Recreation Coordinator along with its corresponding filing obligations on April
13 22, 2020. As a designated official with the City of Los Angeles Department of Recreation and Parks,
14 Innocent was required to timely file an Assuming Office SEI by the May 22, 2020 deadline, a 2020
15 Annual SEI by the April 1, 2021 deadline, a 2021 Annual SEI by the April 1, 2022 deadline, a 2022
16 Annual SEI by the April 3, 2023 deadline, a 2023 Annual SEI by the April 2, 2024 deadline, and a
17 Leaving Office SEI by the December 26, 2024 deadline.

18 The Los Angeles City Ethics Commission contacted Innocent in writing on or around July 7, 2021
19 to remind Innocent of her 2020 Annual SEI filing obligation. After not receiving compliance from
20 Innocent regarding her outstanding SEI, the Los Angeles City Ethics Commission referred the matter to
21 the Fair Political Practices Commission’s Enforcement Division.

22 The Los Angeles City Ethics Commission informed the Enforcement Division of Innocent’s
23 outstanding Assuming Office, Annual, and Leaving Office SEIs. The Enforcement Division staff then
24 contacted Innocent at least three times by mail or email and at least once by phone between July 7, 2024
25

26 ²³ Ibid.

27 ²⁴ Ibid.

1 and September 25, 2024 to remind her of her filing obligations. On or around August 28, 2024, Innocent
2 responded to one of the contacts. However, Innocent ultimately failed to complete all corrective measures
3 required by the Commission.

4 **VIOLATIONS**

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

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

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

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

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

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

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

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

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

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

20 Count 6: Failure to Timely File a Leaving Office SEI

21 Innocent failed to timely file a Leaving Office SEI by the December 26, 2024 due date, in
22 violation of Government Code Section 87300.

23 **EXCULPATORY INFORMATION**

24 None currently known.

25 ///

26 ///

1 **OTHER RELEVANT EVIDENCE**

2 Innocent called the Commission on or around October 16, 2024, complaining about receiving an
3 email demanding she pay late filing fees. When provided with a copy of the email, Commission staff
4 determined that the City of Los Angeles sent Innocent another notification about her late filing and the
5 corresponding late filing fee. Innocent proceeded to claim that she had been told by Commission staff
6 not to file any of her outstanding SEIs until Commission staff called her and directed her to do so.
7 Emails from Commission staff on September 4, 2024 and September 25, 2024 confirm that no such
8 direction was ever given. In fact, the emails show that Innocent was explicitly directed to file all
9 outstanding SEIs. To date, Innocent has not filed any SEIs related to her position as a Recreation
10 Coordinator.

11 **CONCLUSION**

12 Probable cause exists to believe that Innocent violated the Act as detailed above. The Enforcement
13 Division respectfully requests an order finding probable cause pursuant to Section 83115.5 and
14 Regulation 18361.4.

15
16 Dated: February 18, 2025.

Respectfully Submitted,

17 **FAIR POLITICAL PRACTICES COMMISSION**

18 Angela J. Brereton
Assistant Chief of Enforcement

19 *Kristin E. Goulet*

20 _____
21 By: Kristin E. Goulet
22 Commission Counsel
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. 2024-00816 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

Thara Innocent


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 ~~1102~~ 3050
SACRAMENTO, CALIFORNIA 95811

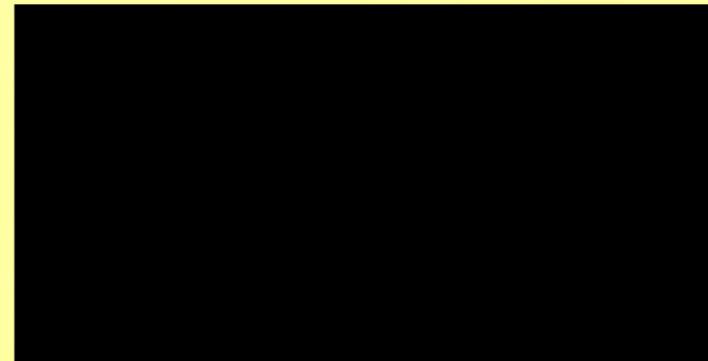


CERTIFIED MAIL®



9589 0710 5270 0783 4029 20

Thara Innocent

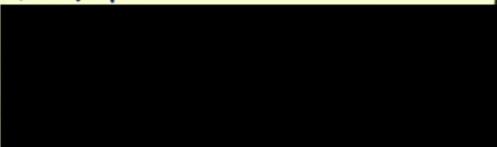


SENDER: COMPLETE THIS SECTION

- 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:

Thara Innocent



9590 9402 8804 4005 9555 34

2. Article Number (Transfer from service label)

9589 0710 5270 0783 4029 20

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

USPS TRACKING #



SANTA CLARA CA 913

21 FEB 2025 PM 5 L



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

9590 9402 8804 4005 9555 34

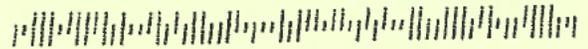
United States
Postal Service

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
PRACTICES COMMISSION

25 FEB 24 PM 12:16

• Sender: Please print your name, address, and ZIP+4® in this box•

FPPC C/O KR & KG
1102 Q Street, suite 3050,
Sacramento, CA 95811



SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- 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.

- A. Signature *[Handwritten Signature]* Agent
 Addressee
- B. Received by (Printed Name) C. Date of Delivery *[Handwritten Date]*
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

1. Article Addressed to:

Thara Innocent



9590 9402 8804 4005 9555 34

2. Article Number (Transfer from service label)

89 0710 5270 0783 4029 20

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

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

Domestic Return Receipt

Tracking Number:

Remove X

9589071052700783402920

Copy

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

Latest Update

Your item was delivered to an individual at the address at 3:07 pm on February 21, 2025 in [REDACTED].

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

[REDACTED]
February 21, 2025, 3:07 pm

Delivery Exception, Animal Interference

[REDACTED]
February 20, 2025, 5:59 pm

Hide Tracking History

Feedback

[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. 2024-00816
11)
12 THARA INNOCENT,) **EX PARTE REQUEST FOR A FINDING OF**
13) **PROBABLE CAUSE AND AN ORDER**
14 Respondent.) **THAT AN ACCUSATION BE PREPARED**
) **AND SERVED**
) Gov. Code § 83115.5

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

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

23 In the cover letter, dated February 18, 2025, and the packet of materials, Innocent was advised
24 that she could respond in writing to the PC Report and orally present the case to the Hearing Officer at 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 to be held in Sacramento. Innocent was further advised that in order to have a
2 probable cause conference, she needed to make a written request for one on or before 21 days of the date
3 she was served with the PC Report. Additionally, Innocent was advised that if she did not request a
4 probable cause conference, such a conference would not be held, and probable cause would be
5 determined based solely on the PC Report, any written response by Innocent, and any rebuttal submitted
6 by the Enforcement Division. To date, Innocent has not submitted a written response to the PC Report
7 and has not requested a probable cause conference.

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

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

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

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

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

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

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

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

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

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

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

26 ///

27 ///

1 **Count 6: Failure to Timely File a Leaving Office SEI**

2 Innocent failed to timely file a Leaving Office SEI by the December 26, 2024 due date, in
3 violation of Government Code Section 87300.

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

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

8 **Thara Innocent**

9 [REDACTED]
[REDACTED]

10 Dated: April 10, 2025

Respectfully Submitted,

11 **FAIR POLITICAL PRACTICES COMMISSION**

12 Angela J. Brereton

Assistant Chief of Enforcement

13 *Kristin E. Goulet*

14 _____
15 By: Kristin E. Goulet
16 Commission Counsel
17 Enforcement Division

18
19
20
21
22
23
24
25
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. 2024-00816
5 THARA INNOCENT,)
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 10, 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 Thara Innocent (“Innocent”) on February 21,
17 2025 by certified mail, return receipt requested. Accompanying the PC Report was a packet of materials
18 that informed the Respondent of her 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 Respondent Innocent and the subsequent Ex Parte Request in this
4 matter alleges six violations of the Political Reform Act were committed, as follows:

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

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

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

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

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

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

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

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

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

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

20 Count 6: Failure to Timely File a Leaving Office SEI

21 Innocent failed to timely file a Leaving Office SEI by the December 26, 2024 due date, in
22 violation of Government Code Section 87300.

23 Based on the Ex Parte Request given to me, I find that notice has been given to Innocent.³ I
24 further find, based on the PC Report and the Ex Parte Request, that there is probable cause to believe
25 that the Innocent violated the Political Reform Act as alleged in Count 1 through 6, as identified above.
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 Innocent in
2 accordance with this finding.

3 IT IS SO ORDERED.

4
5 *04/14/2025*
6 Dated: _____

L. Karen Harrison

7 Hearing Officer
8 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**
1102 Q St, 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

11 In the Matter of:) FPPC Case No. 2024-00816
12)
13 THARA INNOCENT,) **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. Duty to Timely File Leaving Office Statement of Economic Interest**

21 12. The Act requires all employees leaving designated positions to file statements of economic
22 interest (“SEI”) within 30 days after leaving office.¹⁵ If a statement or report is required to be filed before or
23 on a specified date, and the filing deadline falls on a Saturday, Sunday, or official state holiday, the filing

24 ⁷ Section 87300.

25 ⁸ Section 87302, subd. (a).

26 ⁹ Section 87300.

27 ¹⁰ Section 81005.

28 ¹¹ Section 87302, subd. (b).

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

¹³ Section 81005.

¹⁴ Section 87300.

¹⁵ Section 87302, subd. (b).

1 deadline for the statement or report shall be extended to the next regular business day.¹⁶ Leaving Office SEIs
2 shall disclose any reportable investments, interests in real property, and business positions held on the
3 date of assuming office and income received during the 12 months prior to the date of assuming office or
4 the date of being appointed or nominated, respectively.¹⁷

5 **F. City of Los Angeles Department of Recreation and Parks' Conflict of Interest Code**

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

15 14. The City of Los Angeles Department of Recreation and Parks incorporated by reference
16 the Political Reform Act, its associated regulations, and the instructions for Form 700 into the City of
17 Los Angeles Department of Recreation and Parks' Conflict of Interest Code.²⁰

18 **G. Factors to be Considered by the Fair Political Practices Commission**

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

26 ¹⁶ Section 81005.

27 ¹⁷ Regulation 18730, subd. (b)(5)(D).

28 ¹⁸ City of Los Angeles Department of Recreation and Parks Conflict of Interests Code.

¹⁹ Ibid.

²⁰ Ibid.

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.²¹

7 **GENERAL FACTS**

8 16. Innocent had been a Recreation Coordinator for the City of Los Angeles Department of
9 Recreation and Parks since October 28, 2018. On April 22, 2020, the position of Recreation Coordinator
10 was added as a designated position to the City of Los Angeles Department of Recreation and Parks'
11 Conflict of Interest Code. As such, Innocent is considered to have assumed the position of Recreation
12 Coordinator along with its corresponding filing obligations on April 22, 2020. Innocent left the position
13 on November 25, 2024.

14 17. Innocent failed to timely file an Assuming Office SEI by the May 22, 2020 deadline.

15 18. Innocent failed to timely file a 2020 Annual SEI by the April 1, 2021 deadline.

16 19. The Los Angeles City Ethics Commission contacted Innocent once in writing on July 7,
17 2021 to remind her of her obligation to file a 2020 Annual SEI.

18 20. After not receiving compliance, the Los Angeles City Ethics Commission referred the
19 matter to the Enforcement Division on December 20, 2021.

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

21 22. Innocent failed to timely file a 2022 Annual SEI by the April 3, 2023 deadline.²²

22 23. Innocent failed to timely file a 2023 Annual SEI by the April 2, 2024 deadline.²³

23 24. Innocent left the position on November 25, 2024 and failed to timely file a Leaving
24 Office SEI by the December 26, 2024 deadline.²⁴

25 ²¹ Regulation 18361.5, subdivision (e).

26 ²² 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.

27 ²³ 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.

28 ²⁴ 30 days after November 25, 2024 was December 25, 2024, which was a holiday, so the due date was extended to
the next regular business day, which was December 26, 2024.

1 **Count 1**

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

3 33. Complainant incorporates paragraphs 1–32 of this Accusation, as though completely set
4 forth herein.

5 34. Innocent, as a designated official, had a duty under the Act to file an Assuming Office SEI
6 May 22, 2020.

7 35. Innocent failed to timely file her Assuming Office SEI by the May 22, 2020 due date.

8 36. By failing to file her Assuming Office SEI by the May 22, 2020 deadline, Innocent violated
9 Government Code section 87300.

10 **Count 2**

11 **Failure to Timely File a 2020 Annual SEI**

12 37. Complainant incorporates paragraphs 1–32 of this Accusation, as though completely set
13 forth herein.

14 38. Innocent, as a designated official, had a duty under the Act to file a 2020 Annual SEI by
15 April 1, 2021.

16 39. Innocent failed to timely file her 2020 Annual SEI by the April 1, 2021 due date.

17 40. By failing to file her 2020 Annual SEI by the April 1, 2021 deadline, Innocent violated
18 Government Code section 87300.

19 **Count 3**

20 **Failure to Timely File a 2021 Annual SEI**

21 41. Complainant incorporates paragraphs 1–32 of this Accusation, as though completely set
22 forth herein.

23 42. Innocent, as a designated official, had a duty under the Act to file a 2021 Annual SEI by
24 April 1, 2022.

25 43. Innocent failed to timely file her 2021 Annual SEI by the April 1, 2022 due date.

26 44. By failing to file her 2021 Annual SEI by the April 1, 2022 deadline, Innocent violated
27 Government Code section 87300.

28 ///

1 **Count 4**

2 **Failure to Timely File a 2022 Annual SEI**

3 45. Complainant incorporates paragraphs 1–32 of this Accusation, as though completely set
4 forth herein.

5 46. Innocent, as a designated official, had a duty under the Act to file a 2022 Annual SEI by
6 April 3, 2023.

7 47. Innocent failed to timely file her 2022 Annual SEI by the April 3, 2023 due date.

8 48. By failing to file her 2022 Annual SEI by the April 3, 2023 deadline, Innocent violated
9 Government Code section 87300.

10 **Count 5**

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

12 49. Complainant incorporates paragraphs 1–32 of this Accusation, as though completely set
13 forth herein.

14 50. Innocent, as a designated official, had a duty under the Act to file a 2023 Annual SEI by
15 April 2, 2024.

16 51. Innocent failed to timely file her 2023 Annual SEI by the April 2, 2024 due date.

17 52. By failing to file her 2023 Annual SEI by the April 2, 2024 deadline, Innocent violated
18 Government Code section 87300.

19 **Count 6**

20 **Failure to Timely File a Leaving Office SEI**

21 53. Complainant incorporates paragraphs 1–32 of this Accusation, as though completely set
22 forth herein.

23 54. Innocent, as a designated official, had a duty under the Act to file a Leaving Office SEI by
24 December 26, 2024.

25 55. Innocent failed to timely file her Leaving Office SEI by the December 26, 2024 due date.

26 56. By failing to file her Leaving Office SEI by the December 26, 2024 deadline, Innocent
27 violated Government Code section 87300.

28 ///

1 **MITIGATING OR EXCULPATORY FACTORS**

- 2 1. The Enforcement Division is not aware of mitigating or exculpatory factors.

3 **AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS**

- 4 2. The Enforcement Division is not aware of aggravating factors or other relevant materials.

5 **PRAYER**

6 WHEREFORE, Complainant prays as follows:

- 7 1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and
8 Regulation 18361.5, and at such hearing find that Innocent violated the Act as alleged
9 herein;
- 10 2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
11 order Innocent to file the Assuming Office SEI, and pursuant to Section 83116, subdivision
12 (c), order Innocent to pay a monetary penalty of up to \$5,000 for the violation of the Political
13 Reform Act alleged in **Count 1**;
- 14 3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
15 order Innocent to file the 2020 Annual SEI, and pursuant to Section 83116, subdivision (c),
16 order Innocent to pay a monetary penalty of up to \$5,000 for the violation of the Political
17 Reform Act alleged in **Count 2**;
- 18 4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
19 order Innocent to file the 2021 Annual SEI, and pursuant to Section 83116, subdivision (c),
20 order Innocent to pay a monetary penalty of up to \$5,000 for the violation of the Political
21 Reform Act alleged in **Count 3**;
- 22 5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
23 order Innocent to file the 2022 Annual SEI, and pursuant to Section 83116, subdivision (c),
24 order Innocent to pay a monetary penalty of up to \$5,000 for the violation of the Political
25 Reform Act alleged in **Count 4**;
- 26 6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
27 order Innocent to file the 2023 Annual SEI, and pursuant to Section 83116, subdivision (c),
28

1 order Innocent to pay a monetary penalty of up to \$5,000 for the violation of the Political
2 Reform Act alleged in **Count 5**;

3 7. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
4 order Innocent to file the Leaving Office SEI, and pursuant to Section 83116, subdivision
5 (c), order Innocent to pay a monetary penalty of up to \$5,000 for the violation of the Political
6 Reform Act alleged in **Count 6**;

7 8. 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 9. 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

<p>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</p> <p>TELEPHONE NO.: (279) 237-5946 FAX NO.: (916) 322-1932 ATTORNEY FOR:</p>	<p style="text-align: center;">FOR COURT USE ONLY</p>
<p>BEFORE THE FAIR POLITICAL PRACTICES COMMISSION</p> <p>STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:</p>	
<p>RESPONDENT: In the Matter of Thara Innocent</p>	<p>CASE NUMBER: 2024-00816</p>
<p>PROOF OF SERVICE</p>	<p>Ref. No. or File No.: Thara Innocent</p>

1. I am over 18 years of age and not a party to this action.
2. Received by AAA Attorney Services II, Inc. on 6/26/2025 at 2:15 pm to be served on **THARA INNOCENT, NOBEL UNIVERSITY DEPARTMENT OF ATHLETICS, 6131 ORANGETHORPE AVENUE, SUITE #116, BUENA PARK, CA 90620.**
3. **SUBSTITUTE** served by delivering a true copy of the **Accusation, Statement to Respondent, Office of Administrative Hearings, Proof of Service** with the date and hour of service endorsed thereon by me, to: **LES BEAN** as **HEAD COACH**, a person employed therein and authorized to accept service for **THARA INNOCENT, NOBEL UNIVERSITY DEPARTMENT OF ATHLETICS** at the address of: **6131 ORANGETHORPE AVENUE, SUITE #116, BUENA PARK, CA 90620**, the within named person's usual place of **Work**, in compliance with State Statutes.
4. Date and Time of service: 6/30/2025 at 1:10 pm
5. Additional Information pertaining to this service:

** A true copy of the documents were sealed and placed in the United States mail with First Class postage prepaid on & from: Date: 10/8/25 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: Veronica Solano
Firm: AAA Attorney Services II, Inc.
Address: 714 W. Olympic Blvd., Ste. 638, Los Angeles, CA 90015
Telephone number: (213) 746-8010
Registration Number: 6230
County: Orange
The fee for the service was: \$80.60
8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10/8/2025

Veronica Solano

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



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

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:	
: RESPONDENT: In the Matter of Thara Innocent	CASE NUMBER: 2024-00816
DECLARATION OF MAILING	Ref. No. or File No.: Thara Innocent

1. I, C. Morales, am at least 18 years of age and not a party to this action.
2. Documents mailed:

Accusation, Statement to Respondent, Office of Administrative Hearings, Proof of Service
3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 10/8/2025
Location: ORANGE, CA
Addressed: THARA INNOCENT, NOBEL UNIVERSITY DEPARTMENT OF ATHLETICS, 6131
ORANGETHORPE AVENUE, SUITE #116, BUENA PARK, CA 90620
4. Person performing mailing:

Name: C. Morales
Firm: AAA Attorney Services II, Inc.
Address: 714 W. Olympic Blvd., Ste. 638, Los Angeles, CA 90015
Telephone Number: (213) 746-8010
5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10/8/25

C. Morales

(PRINTED NAME)



(SIGNATURE)

Exhibit A-7

Dear Thara,

Congratulations on your new position as Recreation Coordinator for the Department of Recreation and Parks.

Because this position is designated on your agency's conflict of interests (COI) code, you are required by state law to file an *assuming office statement of economic interests* (Form 700) within 30 days of starting your new position.

Our records indicate that you started your position on April 22, 2020. Therefore, your **Form 700** is due by **May 22, 2020**.

*Please disregard this e-mail if you have already filed your assuming office form(s).
If "Voluntary" appears in your agency's name above you are not required to file, but may do so voluntarily.*

Please follow the steps below to complete and file your form.

1. Review your position's disclosure category.

- a. Based on your position and decision-making authority, your disclosure category specifies the types of financial interests that must be reported on your Form 700.
- b. Your disclosure category is located in your agency's COI code, which can be found by clicking [here](#).

2. Review your reportable interests.

- a. Your disclosure category identifies which financial interests you must report. They may include **income, gifts, investments**, interests in **real property**, and **business positions**.
- b. 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.
- c. Income and gifts identified in your disclosure category must be reported if received within the 12 months prior to the date you started in your position.
- d. Investments and interests in real property identified in your disclosure category must be reported if held on the day you started in your position. Business positions identified in your disclosure category that you held on the day you started must also be reported.
- e. The [Form 700 reference pamphlet](#) has useful definitions and examples of commonly reported interests.

3. File an electronic Form 700 using eDisclosure.

- a. Use the login ID and password that were emailed to you to log into eDisclosure at <https://www.southtechhosting.com/LosAngelesCity/eDisclosure>.
- b. Once your form completely and accurately identifies your reportable interests, click on the "Submit Electronically" button to electronically file it.

If you have questions regarding your Form 700, please contact the Ethics Commission at (213) 978- 1960 or ethics.sei@lacity.org.

As a reminder, *late penalties* of \$10 per day (\$100 maximum) must be assessed for forms not filed by the deadline.

Mandatory Online Ethics Training

City and state laws require all City officials, commissioners, and designated consultants to complete two hours of ethics training when they assume a designated filing position, and every two years after that. The Ethics Commission's online "*Ethics and Open Government Training*" satisfies this requirement. More information on accessing and taking this training may be found [here](#).

THANK YOU
for doing your part to foster open and accountable City government!

If you think you have received this email in error, please contact your agency's ethics liaison or the liaison's support staff. You can find your liaison's contact information by clicking [here](#).

Exhibit A-8

Dear Thara Innocent,

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.southtechosting.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.

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.*

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 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](#).

Exhibit A-9

Dear Thara Innocent,

We are following up on the annual filing requirement for Form 700. Our records indicate that we have not received your 2021 annual Form 700, which was due on April 1, 2022.

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	89	\$100.00
Total				\$100.00

To comply with the filing requirements, you must take the following steps by **July 29, 2022**:

1. Electronically submit your Form 700 via eDisclosure at <https://www.southtechosting.com/LosAngelesCity/eDisclosure/>; and
2. Do one of the following:
 - a. Pay your fine by submitting 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 **July 29, 2022**. Requests for waivers submitted after **July 29, 2022** 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.

Dear Thara,

Please do not disregard this email. While not from a City email address, this email is an official Ethics Commission communication.

As we informed you on June 29, 2022, your 2021 annual Statement of Economic Interests (Form 700), which was due on April 1, 2022, had not been filed.

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

Accordingly, we informed you that a fine of **\$100.00** had been assessed and that you had 30 days to file your form and either pay the fine or request a waiver. You have not filed your form, nor have we received your payment or a request for a waiver.

Agency	Position	Form Type	Days Late	Fine Owed
Recreation and Parks, Department of	Recreation Coordinator	Form 700	146	\$100.00
Total				\$100.00

Because the 30-day deadline has passed, a waiver is no longer available. However, you are still required by law to file your Form 700 and pay the fine.

To comply with the law, please take the following steps by **September 8, 2022**:

1. Log into eDisclosure here:
<https://www.southtechhosting.com/LosAngelesCity/eDisclosure/>
2. Electronically submit your Form 700 via eDisclosure.
3. Send a **\$100.00** check or money order, payable to the City of Los Angeles, to the Ethics Commission at 200 North Spring Street, Suite 2410, Los Angeles, CA 90012.

If we do not receive your Form 700 and payment in full by **September 8, 2022**, this matter will be referred to the Enforcement Division of the Fair Political Practices Commission. In addition to the late filing fine already accrued, an administrative enforcement penalty of up to \$5,000 per violation may also be imposed. See Government Code § 83116.

If you have any questions regarding this email, please contact the Ethics Commission's Enforcement Division at ethics.enforcement@lacity.org.

Thank you.

Exhibit A-10

Dear Thara Innocent,

We are following up on the annual filing requirement for Form 700. Our records indicate that we have not received your 2022 annual Form 700, which was due on April 3, 2023.

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	107	\$100.00
Total				\$100.00

To comply with the filing requirements, you must take the following steps by **August 18, 2023**:

1. Electronically submit your Form 700 via eDisclosure at <https://www.southtechosting.com/LosAngelesCity/eDisclosure/>; and
2. Do one of the following:
 - a. Pay your fine by submitting 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 18, 2023**. Requests for waivers submitted after **August 18, 2023** 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 if you have any questions regarding this email or the annual filing requirement.

Thank you.

Dear Thara,

Please do not disregard this email. While not from a City email address, this email is an official Ethics Commission communication.

As we informed you on July 19, 2023, your 2022 annual Statement of Economic Interests (Form 700), which was due on April 3, 2023 had not been filed.

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

Accordingly, we informed you that a fine of **\$100.00** had been assessed and that you had 30 days to file your form and either pay the fine or request a waiver. You have not filed your form, nor have we received your payment or a request for a waiver.

Agency	Position	Form Type	Days Late	Fine Owed
Recreation and Parks, Department of	Recreation Coordinator	Form 700	171	\$100.00
Total				\$100.00

Because the 30-day deadline to request a waiver was August 18, 2023, a waiver is no longer available. However, you are still required by law to file your Form 700 and pay the fine.

To comply with the law, please take the following steps by **October 5, 2023**:

1. Log into eDisclosure here:
<https://www.southtechhosting.com/LosAngelesCity/eDisclosure/>
2. Electronically submit your Form 700 via eDisclosure.
3. Send a **\$100.00** check or money order, payable to the City of Los Angeles, to the Ethics Commission at 200 North Spring Street, Suite 2410, Los Angeles, CA 90012.

If we do not receive your Form 700 and payment in full by **October 5, 2023**, this matter will be referred to the Enforcement Division of the Fair Political Practices Commission. In addition to the late filing fine already accrued, an administrative enforcement penalty of up to \$5,000 per violation may also be imposed. See Government Code § 83116.

If you have any questions regarding this email, please contact the Ethics Commission's Enforcement Division at ethics.enforcement@lacity.org.

Thank you.

Exhibit A-11

Dear Thara Innocent,

We are following up on the annual filing requirement for Form 700. Our records indicate that we have not received your 2023 annual Form 700, which was due on April 2, 2024.

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	125	\$100.00
Total				\$100.00

To comply with the filing requirements, you must take the following steps by **September 4, 2024**:

1. Electronically submit your Form 700 via eDisclosure at <https://www.southtechosting.com/LosAngelesCity/eDisclosure/>; and
2. Do one of the following:
 - a. Pay your fine by submitting 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 **September 5, 2024**. Requests for waivers submitted after **September 5, 2024** 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 if you have any questions regarding this email or the annual filing requirement.

Thank you.

Dear Thara,

Please do not disregard this email. While not from a City email address, this email is an official Ethics Commission communication.

As we informed you on August 5, 2024, your 2023 annual Statement of Economic Interests (Form 700), which was due on April 3, 2023 had not been filed.

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

Accordingly, we informed you that a fine of **\$100.00** had been assessed and that you had 30 days to file your form and either pay the fine or request a waiver. You have not filed your form, nor have we received your payment or a request for a waiver.

Agency	Position	Form Type	Days Late	Fine Owed
Recreation and Parks, Department of	Recreation Coordinator	Form 700	196	\$100.00
Total				\$100.00

Because the 30-day deadline to request a waiver was September 5, 2024, a waiver is no longer available. However, you are still required by law to file your Form 700 and pay the fine.

To comply with the law, please take the following steps by **October 29, 2024**:

1. Log into eDisclosure here:
<https://www.southtechhosting.com/LosAngelesCity/eDisclosure/>
2. Electronically submit your Form 700 via eDisclosure.
3. Pay our fine [online](#) or send a **\$100.00** check or money order, payable to the City of Los Angeles, to the Ethics Commission at 200 North Spring Street, Suite 2410, Los Angeles, CA 90012.

If we do not receive your Form 700 and payment in full by **October 29, 2024**, this matter will be referred to the Enforcement Division of the Fair Political Practices Commission. In addition to the late filing fine already accrued, an administrative enforcement penalty of up to \$5,000 per violation may also be imposed. See Government Code § 83116.

If you have any questions regarding this email, please contact the Ethics Commission's Enforcement Division at ethics.enforcement@lacity.org.

Thank you.

Exhibit A-12



December 31, 2025

Thara Innocent
[REDACTED]
[REDACTED]

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC Case No. 2024-00816; In the Matter of Thara Innocent

Dear Thara Innocent:

On October 18, 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 \$24,000 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.

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

¹ Government Code section 11505.

Exhibit A-13



February 3, 2026

Thara Innocent
[REDACTED]
[REDACTED]

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC No. 2024-00816; In the Matter of Thara Innocent

Dear Thara Innocent:

On October 18, 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 \$24,000 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.

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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,

Kristin E. Goulet

Kristin E. Goulet
Commission Counsel
Enforcement Division

Enclosures: Default Decision and Order, Exhibit 1 and attachments