

California Fair Political Practices Commission
MEMORANDUM

To: Chair Ravel, Commissioners Eskovitz, Garrett, Montgomery and Rotunda
From: John W. Wallace, Acting Executive Director
Re: Executive Director's Report
Date: June 26, 2012

FINDINGS OF PROBABLE CAUSE

Pursuant to Regulation 18361, I have found sufficient evidence in the following cases to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that the following respondents committed or caused a violation of the Political Reform Act.

Please note:

- *This finding of probable cause does not constitute a finding that a violation has actually occurred. The respondents are presumed to be innocent of any violation of the Act unless a violation is proved in a subsequent proceeding.*
 - *The following case was decided based on the papers submitted since the respondent did not request a probable cause conference.*
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Failure to File Statements of Economic Interests

An express purpose of the Act, as set forth in Section 81002, subdivision (c), is to ensure that the assets and income of public officials, that may be materially affected by their official actions, be disclosed, so that conflicts of interest may be avoided. In furtherance of this purpose, Section 87203 and Regulation 18723 require that all public officials specified in Section 87200 file an Annual Form 700 by April 1 of the following calendar year.

In the Matter of GILBERT RAMIREZ, JR., FPPC No. 11/130 (One count). As a member of the Coachella City Council, Mr. Ramirez had a duty to timely file an annual Form 700 for the 2009 calendar year. According to the filing officer, Mr. Ramirez did not file the 2009 Form 700 by its due date. By not filing the required form, Mr. Ramirez violated Section 87203 and Regulation 18723.

In the Matter of JONATHAN LEONE, FPPC No. 11/932 (One count). As a member of the Sausalito City Council, Mr. Leone had a duty to timely file an annual Form 700 for the 2010 calendar year. Mr. Leone did not file the 2010 Form 700 by its due date. By not filing the required form, Mr. Leone violated Section 87203 and Regulation 18723. This matter arose out of a referral from the Commission's Technical Assistance Division

**Failure to File Electronic Quarterly Statements
Required of Lobbyist Employers or Lobbying Firms**

The Act requires lobbyist employers and lobbying firms to file statements at specific times disclosing information regarding who their activity. The purpose of the lobbying disclosure provisions is to accurately disclose payments made in connection with influencing legislative or administrative action.

In the Matter of NATIONAL ADMINISTRATIVE SERVICES, FPPC No. 10/365 (Six counts)

1. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2009, through December 31, 2009 in violation of Government Code Section 86116, and Section 84605(a)(4).
2. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2010 through March 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
3. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of April 1, 2010 through June 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
4. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of July 1, 2010 through September 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
5. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2010 through December 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
6. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2011 through March 31, 2011 in violation of Government Code Section 86116, and Section 84605(a)(4).

In the Matter of STATE PUBLIC AFFAIRS COMMITTEE-JUNIOR LEAGUES OF CALIFORNIA, FPPC No. 10/366 (Six counts)

1. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2009, through December 31, 2009 in violation of Government Code Section 86116, and Section 84605(a)(4).
2. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2010 through March 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
3. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of April 1, 2010 through June 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
4. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of July 1, 2010 through September 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
5. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2010 through December 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
6. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2011 through March 31, 2011 in violation of Government Code Section 86116, and Section 84605(a)(4).

In the Matter of WILDLIFE CENTER, FPPC No. 10/367 (Six counts)

1. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2009, through December 31, 2009 in violation of Government Code Section 86116, and Section 84605(a)(4).
2. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2010 through March 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
3. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of April 1, 2010 through June 30, 2010 in violation of Government Code Section 86116, and Section 84605, subdivision (a)(4).
4. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of July 1, 2010 through September 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).

5. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2010 through December 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
6. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2011 through March 31, 2011 in violation of Government Code Section 86116, and Section 84605(a)(4).

In the Matter of CALIFORNIA COLLABORATION FOR YOUTH, FPPC No. 10/362 (Six counts)

1. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2009, through December 31, 2009 in violation of Government Code Section 86116, and Section 84605(a)(4).
2. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2010 through March 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
3. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of April 1, 2010 through June 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
4. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of July 1, 2010 through September 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
5. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2010 through December 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
6. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2011 through March 31, 2011 in violation of Government Code Section 86116, and Section 84605(a)(4).

In the Matter of CALIFORNIA INDUSTRIAL HYGIENE COUNCIL, FPPC No. 10/361 (Six counts)

1. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2009, through December 31, 2009 in violation of Government Code Section 86116, and Section 84605(a)(4).
2. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2010 through March 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).

3. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of April 1, 2010 through June 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
4. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of July 1, 2010 through September 30, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
5. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of October 1, 2010 through December 31, 2010 in violation of Government Code Section 86116, and Section 84605(a)(4).
6. Failure to file an electronic quarterly lobbyist employer statement for the reporting period of January 1, 2011 through March 31, 2011 in violation of Government Code Section 86116, and Section 84605(a)(4).

In the Matter of SACRAMENTO ADVOCACY, FPPC No. 11/427 (One count). Failure to file an electronic quarterly reporting statement required to be filed by Lobbying Firms for the period between July 1, 2010 through September 30, 2010, due November 1, 2010 in violation of Government Code Section 86114(a) and Section 84605(a)(4). This case was initiated in response to a referral from the Secretary of State's Office.