

EXECUTIVE STAFF REPORTS

May 20, 2021 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: ANGELA BRERETON, CHIEF OF ENFORCEMENT

A. Overview

During the period of April 1, 2021 through April 30, 2021 the Enforcement Division received 33 complaints, opened 2 for investigation, and rejected 13. The Enforcement Division received 156 referrals during this time. The Enforcement Division closed a total of 42 cases including:

- 16 warning letters advertisement violations (1), behested payment violations (1), campaign violations (6), and statement of economic interests violations (8);
- 13 no action closure letters alleging advertisement violations (1), campaign violations (5), lobbying violations (1), and statement of economic interests violations (6); and
- 13 approved stipulations from the March and April Commission meetings.

The Division had 1,425 cases in various stages of resolution at the time of the April Monthly Report and currently has approximately 1,440 cases in various stages of resolution, including the 25 cases before the Commission as listed in the May Agenda.

B. Annual Statistics

On the next page, you will find a chart that details the annual statistics for enforcement complaints, referrals and cases. This chart includes the data from 2020, where Enforcement had a highly efficient and effective year, receiving over 2,900 complaints and referrals and closing 1,117 cases with violations found. The information in the chart has been gathered from public reports, information from the defunct and inactive database, and data that has been converted into current form, so the numbers are close estimates in some instances.

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	Ye	ear	2016	2017	2018	2019	2020
1	Complaints Received		1,180	564	1,352	744	1,390
2	Referrals Received		350	1,616	1,529	1,950	1,518
3	Total Complaint and Referrals Received		1,530	2,180	2,881	2,694	2,908
4	Cases opened		1,315	1,480	1,561	1,820	1,155
5	Cases closed ³		1,803	1,477	1,243	1,465	1,526
6	Cases with resolutions approved by the Commission ¹		311	340	235	343	278
	a	Streamline cases approved by Commission	234	262	173	263	194
	b	Mainline cases approved by Commission	70	66	56	73	77
	c	Default cases approved by Commission	7	12	6	7	7
7	Total fines imposed by the Commission		\$894,257	\$1,126,933	\$499,606	\$797,384	\$1,940,107
8	Warning letters issued		489	505	554	584	777
9	Administrative terminations		668	297	177	104	62
10	Cases closed with violations found ²		1,468	1,142	966	1,031	1,117
1	Advisory letters issued		14	17	20	9	7
12	No action closure letters		321	318	252	423	402

¹ Total for lines 6a, 6b, and 6c.
² Total for lines 6, 8, and 9.
³ Total cases closed includes Commission approved cases from the previous year and Commission approved administrative judgements. It does not include Commission approved cases not yet closed.

C. Unexecuted Streamline Stipulations

Streamline penalty stipulations are approved by the Chief of Enforcement and reported to the Commission for discussion only before they are executed. The following streamline stipulations are presented for that purpose. After the close of the hearing, the Chief of Enforcement may execute all or any of the streamline penalty stipulations, at her discretion per Regulation 18360.2.

Since the last Monthly Report, the Enforcement Chief has not used discretion to increase the penalties for Tier Two advertising violations resulting in public confusion, under Regulation 18360.3(d)(7)(B)(i)(b), or to increase the penalties for Tier Two violations involving the same candidate, committee, or principal officer who has paid a Tier One penalty to the Commission or received a Warning Letter from the Commission for the same type of violation occurring within the last five years, based on the resulting public harm.

The Enforcement Chief used discretion under Regulation 18360.2 to exclude violations in one streamline case presented with this report, 20/764 Alpine Firemen's Relief Association and Catherine Salazar-Wilson (Lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact).

Advertising and Campaign Late Filer

In the Matter of Gabrielle Dolphin; FPPC No. 18/1423. Staff: Christopher Burton, Assistant Chief of Enforcement and Lance Hachigian, Special Investigator. Gabrielle Dolphin qualified as an independent expenditure committee opposing Alameda (City) Measure K in the November 6, 2018 General Election. Dolphin failed to timely file two 24-hour reports, in violation of Government Code Section 84204 (2 counts), and failed to include the required disclaimer on two newspaper advertisements published prior to the election, in violation of Government Code Section 84502 (2 counts). Total Penalty: \$1,300 (Tier One & Two).

Campaign Late Filer

In the Matter of Greg Astorian for Glendale City Council 2020, Greg Astorian, and Ramona Astorian; FPPC No. 20/244. Staff: Jenna C. Rinehart, Commission Counsel. Greg Astorian was an unsuccessful candidate for Glendale City Council in the March 3, 2020 Primary Election. Greg Astorian for Glendale City Council 2020 was Astorian's candidate-controlled committee. Ramona Astorian was the Committee's treasurer. The Committee, Astorian, and Astorian failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count), and failed to timely file a 24-hour report, in violation of Government Code Section 84203 (1 count). Total Penalty: \$1,271 (Tier Two).

In the Matter of Leslie Schneider for San Dieguito Union High School Board 2020, Leslie Schneider, and Briana Baleskie; FPPC No. 20/1014. Staff: Angela J. Brereton, Chief of Enforcement and Amber Burnside, Assistant Political Reform Consultant. Leslie Schneider was an unsuccessful candidate for San Dieguito Unified School District Board of Education in the November 3, 2020 General Election. Leslie Schneider for San Dieguito Union High School

Board 2020 was Schneider's candidate-controlled committee. Briana Baleskie was the Committee's treasurer. The Committee, Schneider, and Baleskie failed to timely file a preelection campaign statement, in violation of Government Code Section 84200.5 (1 count), and failed to file three 24-hour reports, in violation of Government Code Section 84203 (3 counts). **Total Penalty: \$1,135 (Tier One).**

In the Matter of Albert Gonzalez for School Board 2020 and Albert Gonzalez; FPPC No. 21/130. Staff: Angela J. Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Albert Gonzalez was a successful candidate for Santa Clara Unified Board of Education in the November 3, 2020 General Election. Albert Gonzalez for School Board 2020 is Gonzalez's candidate-controlled committee. The Committee and Gonzalez failed to timely file a preelection campaign statement, in violation of Government Code Section 84200.5 (1 count). Total Penalty: \$495 (Tier Two).

In the Matter of Azadeh Weber for Saratoga Union School Board 2020, Azadeh Weber, and Steve Haug; FPPC No. 21/204. Staff: Angela J. Brereton, Chief of Enforcement and Dominika Wojenska, Associate Governmental Program Analyst. Azadeh Weber was an unsuccessful candidate for Saratoga Union School District Board in the November 3, 2020 General Election. Azadeh Weber for Saratoga Union School Board 2020 was Weber's candidate-controlled committee. Steve Haug was the Committee's treasurer. The Committee, Weber, and Haug failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count), and failed to timely file a 24-hour report, in violation of Government Code Section 84203 (1 count). Total Penalty: \$466 (Tier One).

In the Matter of Gran for Redondo City Council 2017 and John Gran: FPPC No. 20/718. Staff: Angela J. Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. John Gran was a successful candidate for Redondo Beach City Council in the March 7, 2017 Special Election. Gran for Redondo City Council 2017 was Gran's candidate-controlled committee. The Committee and Gran failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). Total Penalty: \$447 (Tier One).

In the Matter of Angel Carrillo for City Council 2015 and Angel Carrillo; FPPC No. 21/157. Staff: Angela J. Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Angel Carrillo was a successful candidate for Azusa City Council in the March 3, 2015 Primary Election. Angel Carrillo for City Council 2015 was Carrillo's candidate-controlled committee. The Committee and Carrillo failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). Total Penalty: \$402 (Tier One).

In the Matter of Greg Shibley for School Board 2020 and Greg Shibley; FPPC No. 20/1015. Staff: Angela J. Brereton, Chief of Enforcement and Amber Burnside, Assistant Political Reform Consultant. Greg Shibley was a successful candidate for Lemon Grove School District Board of Education in the November 3, 2020 General Election. Greg Shibley for School Board 2020 was Shibley's candidate-controlled committee. The Committee and Shibley failed to timely file a

preelection campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$211 (Tier One).**

In the Matter of Alpine Firemen's Relief Association and Catherine Salazar-Wilson; FPPC No. 20/764. Staff: Angela J. Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Alpine Firemen's Relief Association is a local general purpose committee. Catherine Salazar-Wilson is the Committee's treasurer. The Committee and Salazar-Wilson failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). Total Penalty: \$203 (Tier One).

In the Matter of High Desert Young Democrats and Angela Mayo; FPPC No. 20/1131. Staff: Angela J. Brereton, Chief of Enforcement and Tara Stock, Intake Manager. High Desert Young Democrats is a local general purpose committee. Angela Mayo is the Committee's treasurer. The Committee and Mayo failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). Total Penalty: \$200 (Tier One).

Campaign Late Reporter

In the Matter of Campaign to Re-Elect Elizabeth Ontiveros-Cole and Elizabeth Ontiveros-Cole; FPPC No. 21/023. Staff: Angela J. Brereton, Chief of Enforcement and Ginny Lambing, Political Reform consultant. Elizabeth Ontiveros-Cole was a successful candidate for Pomona City Council in the November 3, 2020 General Election. Campaign to Re-Elect Elizabeth Ontiveros-Cole was Ontiveros-Cole's candidate-controlled committee. The Committee and Ontiveros-Cole failed to timely disclose expenditures on two semi-annual campaign statements, in violation of Government Code Section 84211 (2 counts). Total Penalty: \$327 (Tier One).

Statement of Economic Interests Late Filer

In the Matter of Stella Bratsis; FPPC No. 16/20052. Staff: David E. Castro, Commission Counsel. Stella Bratsis, as a Board Member for the Schools Insurance Group Northern Alliance, failed to timely file a 2015 Annual, 2016 Annual, and a Leaving Office Statement of Economic Interests, in violation of Government Code Sections 87300 and 87302 (3 counts). Total Penalty: \$1,800 (Tier One).

In the Matter of Armando Garcia; FPPC No. 19/099. Staff: David E. Castro, Commission Counsel. Armando Garcia, as a member of the Board of Trustees for Leonardo da Vinci Health Sciences Charter School, failed to timely file a 2017 Annual, 2018 Annual, and a 2019 Annual/Leaving Office Statement of Economic Interests, in violation of Government Code Section 87300 and 87302 (3 counts). Total Penalty: \$600 (Tier One).

In the Matter of David Wang; FPPC No. 17/958. Staff: Angela J. Brereton, Chief of Enforcement and Amber Burnside, Assistant Political Reform Consultant. David Wang, a Senior Transportation Engineer for the Department of Transportation, failed to timely file a 2016 and 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). Total Penalty: \$400 (Tier One).

In the Matter of Sameer Haddadeen; FPPC No. 17/1042. Staff: Angela J. Brereton, Chief of Enforcement and Political Reform Consultant, Chloe Hackert. Sameer Haddadeen, as a Supervising Transportation Engineer for the Department of Transportation, failed to timely file a 2016 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). Total Penalty: \$200 (Tier One).

In the Matter of Christopher Harms; FPPC No. 19/895. Staff: Angela J. Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Christopher Harms, as a Board Member of the Potrero Community Planning Group, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). Total Penalty: \$200 (Tier One).

In the Matter of Thomas Finnila; FPPC No. 19/1212. Staff: Angela J. Brereton, Chief of Enforcement and Amber Burnside, Assistant Political Reform Consultant. Thomas Finnila, a Building Mechanical Inspector for the Department of Building and Safety, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). Total Penalty: \$200 (Tier One).

In the Matter of Hillary Hulteen; FPPC No. 19/1474. Staff: Angela J. Brereton, Chief of Enforcement and Amber Burnside, Assistant Political Reform Consultant. Hillary Hulteen, a Trustee for Twin Ridges Elementary School District, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). Total Penalty: \$200 (Tier One).

In the Matter of Chris Dobson; FPPC No. 21/172. Staff: Angela J. Brereton, Chief of Enforcement and Shaina Elkin, Staff Services Analyst. Chris Dobson, a Board Member for the Colusa Groundwater Authority, failed to timely file a 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). Total Penalty: \$200 (Tier One).

In the Matter of Ruben Abrica; FPPC No. 21/194. Staff: Angela J. Brereton, Chief of Enforcement and Kimberly Rawnsley, Staff Services Analyst. Ruben Abrica, a member of the East Palo Alto City Council, failed to timely file a 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). Total Penalty: \$200 (Tier One).

In the Matter of Ofelia Bello; FPPC No. 21/218. Staff: Angela J. Brereton, Chief of Enforcement and Kimberly Rawnsley, Staff Services Analyst. Ofelia Bello, a Planning Commissioner for the City of East Palo Alto, failed to timely file a 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). Total Penalty: \$200 (Tier One).

<u>In the Matter of William Wesley; FPPC No. 21/222.</u> Staff: Angela J. Brereton, Chief of Enforcement and Kimberly Rawnsley, Staff Services Analyst. William Wesley, a Planning Commissioner for the City of Fairfield, failed to timely file a 2019 Annual Statement of

Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Marcia Sablan; FPPC No. 21/236. Staff: Angela J. Brereton, Chief of Enforcement and Kimberly Rawnsley, Staff Services Analyst. Marcia Sablan, a member of the Firebaugh City Council, failed to timely file a 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). Total Penalty: \$200 (Tier One)

II. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

California State Association of Counties and California School Boards Association v. FPPC
County of Los Angeles Superior Court, Central District
Case No. BS174653

On September 11, 2018, petitioners served a first amended petition for writ of mandate and complaint for declaratory relief. Petitioners allege that Regulations 18420.1 and 18901.1 are invalid as a matter of law, that the Commission has exceeded its jurisdiction in adopting these Regulations, and that the Regulations are unenforceable.

On March 29, 2019, the Commission's Motion for Judgment on the Pleadings was granted with leave to amend. The court vacated all hearing dates and set a new trial setting conference. Plaintiffs timely filed a second amended complaint on June 27, 2019.

The Commission filed a demurrer and the hearing occurred on November 22, 2019. In its ruling, the court: (1) sustained the demurrer to the first cause of action without leave to amend; (2) sustained the demurrer with leave to amend on plaintiff CSBA's standing on all cause of action and plaintiff CSAC's standing on all causes of actions challenging Regulation 18901.1; and (3) overruled the remaining grounds for demurrer.

Petitioners filed a third amended complaint, and the Commission filed an answer. The parties submitted pretrial briefs and after hearing on December 4, 2020, the court issued an order denying the writ. Notice of entry of the court's judgment was served on January 12, 2021.

Petitioners filed a timely notice of appeal on March 10, 2021. Updates on the various appellate filing deadlines will be provided when dates are set.

Mat Wahlstrom v. California Fair Political Practices Commission and Steven J. Kaufman San Diego County Superior Court, Central Division
Case No. 37-2020-00030654-CU-WM-CTL

Petitioner filed a petition for writ of mandate on August 31, 2020. The petition seeks to set aside a streamline stipulation, decision and order against Todd Gloria adopted by the Commission in November 2019. The Attorney General is representing the Commission. The Commission filed an answer to the complaint on October 22, 2020.

B. Outreach and Training

Webinars

- April 13th, the FPPC hosted a Candidate/Treasurer webinar. Staff Services Manager, Alana Jeydel, and Political Reform Consultant, Stephen Hernandez presented. 19 people attended.
- April 21st, the FPPC hosted a Campaign Filing Officer webinar. Political Reform Consultants Katie Trumbly and Adam Ramirez presented. 36 people attended.

Scheduled Webinars

- June 15th, the FPPC is hosting a Candidate/Treasurer webinar.
- June 23rd, the FPPC is hosting a Campaign Filing Officer webinar

Video Tutorials

Commission video tutorials were accessed a total of 319 times in April. Form 700 videos
were accessed 88 times, the Candidate/Treasurer video was accessed 87 times, and the
filing officer videos were accessed 144 times.

C. Advice

The April 30, 2021, Advice Letter Report is available at <u>Advice Letter Report - April 2021</u> (ca.gov).

In April, the Legal Division responded to the following requests for advice:

- *Education Program*: The Education Program responded to 432 requests for technical assistance via phone.
- *Requests for Advice:* The Email Advice and Conflict of Interest Code Program and Legal Division attorneys collectively responded to more than 613 email and telephone requests for advice, 87 of which were not responded to within 24 hours.
- *Advice Letters:* The Legal Division received seven advice letter requests under the Political Reform Act and completed 10.
- **Section 1090 Letters:** The Legal Division received seven advice letter request concerning Section 1090 and completed nine. This year to date, we have received 19 advice requests regarding Section 1090.

D. Miscellaneous Decisions

None to report.

E. Potential Upcoming Regulations

June 17th, 2021

• Campaign Ads and Media. (Regulation 18421.5.) Update existing regulation requiring advertising disclosure for online content paid for by a committee and adopt a new regulation interpreting when a communication made in the style of a media report qualifies as an advertisement under the Act. (Prenotice.)

July 15th, 2021

- Behested Payment Reporting. (Regulations 18204 and 18215.3.) Regulatory additions and amendments to improve the efficiency and transparency of behested payment reporting, including providing for reporting of good faith estimates of payments in certain circumstances, and clarifying rules for disclosure of payments made in response to third party fundraising solicitations. (Prenotice.)
- Permissible Campaign Expenditures. (New Regulation.) Provide guidance on whether an expenditure of campaign funds has a sufficient political, legislative, or governmental purpose under Article 4 of the Act. Provisions may include specific items previously addressed through the advice or opinion process, and/or generally applicable guidelines. (Adoption.)
- Disclose Act. (Regulations 18421.5, 18435.5, 18450.1, and 18450.11.) Various regulatory additions and amendments to interpret and clarify provisions of the Disclose Act including disclosures on advertisements in multiple languages, disclosures on electronic slate mailers, disclosures on various forms of social media, and paid spokesperson disclosure. (Adoption.)

August 19th, 2021

• Lobbyist Recordkeeping. (Regulation 18612.) Update and enhance recordkeeping requirements for lobbyists and lobbying entities. (Prenotice.)

F. Conflict of Interest Codes

Adoptions and Amendments

State Agency Conflict of Interest Codes

• CA State Transportation Agency

Multi-County Agency Conflict of Interest Codes

- Caliber Public Schools
- Cooperative Personnel Services
- Gorman Learning Center
- Napa Valley Community College District
- Riverside Schools Insurance Authority JPA
- Riverside Schools Risk Management Authority

Exemptions

• None to Report.

Extensions

• None to Report.

G. Probable Cause Hearings

Please note, a finding of probable cause does not constitute a finding that a violation has occurred. The respondents are presumed to be innocent of any violation of the Act unless a violation is proven in a subsequent proceeding.

The following matters were decided based solely on the papers. The respondents did not request a probable cause hearing.

- 1. In the Matter of H. Fangary for Hermosa Beach City Council 2013, H.S. Fangary for City Council 2017, Dina Fangary, and Hany S. Fangary, Case No. 2018-00005. On April 14, 2021, probable cause was found to believe Respondents committed the following violations of the Act:
- Count 1: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2017 through June 30, 2017 by the deadline of July 31, 2017, in violation of Government Code Section 84200.
- Count 2: The 2013 Committee, Fangary, and D. Fangary failed to timely file a pre-election campaign statement for the reporting period of July 1, 2017 through September 23, 2017 by the deadline of September 28, 2017, in violation of Government Code Section 84200.5 and 84200.8.
- Count 3: The 2013 Committee, Fangary, and D. Fangary failed to timely file a pre-election campaign statement for the reporting period of September 24, 2017 through October 21, 2017 by the deadline of October 26, 2017, in violation of Government Code Section 84200.5 and 84200.8.

- Count 4: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of October 22, 2017 through December 31, 2017 by the deadline of January 31, 2018, in violation of Government Code Section 84200.
- Count 5: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2018 through June 30, 2018 by the deadline of July 31, 2018, in violation of Government Code Section 84200.
- Count 6: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2018 through December 31, 2018 by the deadline of January 31, 2019, in violation of Government Code Section 84200.
- Count 7: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019 by the deadline of July 31, 2019, in violation of Government Code Section 84200.
- Count 8: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019 by the deadline of January 31, 2020, in violation of Government Code Section 84200.
- Count 9: The 2013 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 through June 30, 2020 by the deadline of July 31, 2020, in violation of Government Code Section 84200.
- Count 10: The 2017 Committee, Fangary, and D. Fangary failed to timely file a pre-election campaign statement for the reporting period of January 1, 2017 through September 23, 2017 by the deadline of September 28, 2017, in violation of Government Code Section 84200.5 and 84200.8.
- Count 11: The 2017 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of October 22, 2017 through December 31, 2017 by the deadline of January 31, 2018, in violation of Government Code Section 84200.
- Count 12: The 2017 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2018 through June 30, 2018 by the deadline of July 31, 2018, in violation of Government Code Section 84200.
- Count 13: The 2017 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2018 through December 31, 2018 by the deadline of January 31, 2019, in violation of Government Code Section 84200.

- Count 14: The 2017 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019 by the deadline of July 31, 2019, in violation of Government Code Section 84200.
- Count 15: The 2017 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019 by the deadline of January 31, 2020, in violation of Government Code Section 84200.
- Count 16: The 2017 Committee, Fangary, and D. Fangary failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 through June 30, 2020 by the deadline of July 31, 2020, in violation of Government Code Section 84200.
- Count 17: The 2017 Committee, Fangary, and D. Fangary failed to utilize a single, designated campaign bank account for all contributions and all deposits, in violation of Government Code Section 85201.
- Count 18: The 2017 Committee, Fangary, and D. Fangary failed to include the address of the responsible committee on a mass mailing, in violation of Government Code Section 84305.
 - 2. *In the Matter of Joaquin Lanuza, Case No. 2019-00460.* On April 16, 2021, probable cause was found to believe Respondent committed the following violations of the Act:
- Count 1: Lanuza failed to timely file an Annual 2017 SEI by April 2, 2018, in violation of Government Code section 87203.
- Count 2: Lanuza failed to timely file a Leaving Office SEI by January 11, 2019, in violation of Government Code section 87204.

III. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: LORESSA HON, CHIEF OF ADMINISTRATION

New Employee Report

Enforcement Division

Alex Rose, Enforcement Counsel

Statement of Economic Interest (Form 700)

As of May 10, 2021, there were 134 Form 700 non-filers of the 2019/2020 Annual Form 700 filing. The Statement of Economic Interest Unit has made all annual non-filer referrals to the Enforcement Division.