



EXECUTIVE STAFF REPORTS

September 16, 2021 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: ANGELA BRERETON, CHIEF OF ENFORCEMENT

A. Overview

During the period of August 1, 2021 through August 31, 2021 the Enforcement Division received 66 complaints, opened 15 for investigation, and rejected 12. The Enforcement Division received 162 referrals during this time. The Enforcement Division closed a total of 53 cases including:

- 21 warning letters –behested payment violations (1), campaign violations (7), lobbying (1), and statement of economic interests violations (12);
- 22 no action closure letters alleging – advertisement violations (1), campaign violations (6), revolving door (1), conflict of interests (1), and statement of economic interests violations (13);
- 6 approved stipulations from the July Commission meeting;
- 2 advisory letters for behested payment violations; and
- 2 committees were administratively terminated.

The Division had 1,568 cases in various stages of resolution at the time of the August Monthly Report and currently has approximately 1,625 cases in various stages of resolution, including the 31 cases before the Commission as listed in the September 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.

	Year	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.

D. 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 the Chief's 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 two streamline cases presented with this report: Justin Sha for Fremont Mayor 2020, Justin Sha, and Ron Sha; FPPC No. 21/663 (Lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact.); Grynchal for Claremont City Council 2017, Anthony Grynchal, and Annie Baenen; FPPC No. 17/010 (Lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact, and the committee raised and spent less than \$10,000.).

Advertisements/Campaign Late Filer

In the Matter of Real Justice PAC (FEC PAC ID #C00632554) and Rebecca Bond; FPPC No 18/242. Staff: Theresa Gilbertson, Senior Commission Counsel. The respondents were represented by Nicholas Sanders of the Sutton Law Group. Real Justice PAC (FEC PAC ID #C00632554) is a federal political action committee registered as a state general purpose committee in California. Rebecca Bond is the Committee's treasurer. The Committee and Bond failed to timely amend the Committee's statement of organization to indicate the date of qualification as a California recipient committee, in violation of Government Code Section 84103 (1 count); failed to timely file a semiannual campaign statement, in violation of Government Code Section 84200 (1 count); and failed to include the required "paid for by" disclaimer on text message advertisements in connection with the June 5, 2018 Primary Election, in violation of Government Code Section 84504.3 (1 count). **Total Penalty: \$2,224 (Tier One & Two).**

In the Matter of Affordable Housing Alliance PAC and Mitchell Omerberg; FPPC No. 20/869: Staff: David E. Castro, Commission Counsel. Affordable Housing Alliance Political Action Committee is a local general purpose committee and slate mailer organization. The Committee and Omerberg failed to include the required disclosures on two slate mailers in connection with the November 6, 2020 General Election, in violation of Government Code Section 84305.5, subdivision (a) (2 counts). **Total Penalty: \$725 (Tier One).**

In the Matter of California Homeowners Association and Natalie Blanning; FPPC No. 16/19904. Staff: Christopher Burton, Assistant Chief of Enforcement and Paul Rasey, Special Investigator. The respondents were represented by Brian T. Hildreth of Bell, McAndrews & Hiltachk, LLP. California Homeowners Association is a state general purpose committee. Natalie Blanning is the Committee's principal officer. The Committee and Blanning failed to include the required "not authorized" disclaimer on one mailer advertisement in connection with the November 8, 2016 General Election, in violation of Government Code Section 84506.5 (1 count). **Total Penalty: \$459 (Tier Two).**

Campaign Late Filer/Reporter

In the Matter of Leah Basile for Lake Forest City Council 2016, Leah Basile, and Michael Basile; FPPC No. 17/296. Staff: Christopher Burton, Assistant Chief of Enforcement. Leah Basile was a successful candidate for the Lake Forest City Council in the November 8, 2016 General Election. Leah Basile for Lake Forest City Council 2016 was Basile's candidate-controlled committee. Michael Basile was the Committee's treasurer. The Committee, Basile, and Basile failed to timely file eight 24-hour reports, in violation of Government Code Section 84203 (8 counts) and failed to timely report certain contributions and expenditures on two preelection campaign statements and one semi-annual campaign statement, in violation of Government Code Section 84211 (3 counts). **Total Penalty: \$4,720 (Tier One & Two).**

In the Matter of Justin Sha for Fremont Mayor 2020, Justin Sha, and Ron Sha; FPPC No. 21/663. Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Justin Sha was an unsuccessful candidate for Mayor of Fremont in the November 3, 2020 General Election. Justin Sha for Fremont Mayor 2020 was Sha's candidate-controlled committee. Ron Sha was the Committee's treasurer. The Committee, Sha, and Sha failed to timely file four 24-hour reports, in violation of Government Code Section 84203 (4 counts). **Total Penalty: \$3,050 (Tier One & Two).**

In the Matter of Committee Dedicated to Building Healthy Communities Yes on Measure Q and Sabra Johnson; FPPC No. 19/396. Staff: Alex Rose, Commission Counsel. Committee Dedicated to Building Healthy Communities Yes on Measure Q is a local primarily formed committee that supported Measure Q in the November 6, 2018 General Election. Sabra Johnson is the Committee's treasurer. The Committee and Johnson failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count) and failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Penalty: \$842.**

In the Matter of Sudha Kasamsetty for CUSD 2020, Sudha Kasamsetty, and Kishore Kasamsetty; FPPC No. 20/946. Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Sudha Kasamsetty was an unsuccessful candidate for Cupertino Unified School District Board in the November 3, 2020 General Election. Sudha Kasamsetty for CUSD 2020 was Kasamsetty's candidate-controlled committee. Kishore Kasamsetty was the Committee's treasurer. The Committee, Kasamsetty, and Kasamsetty 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: \$538 (Tier One).**

In the Matter of California Society for Respiratory Care PAC and Phil Porte; FPPC No. 19/1733. Staff: Alex Rose, Commission Counsel. California Society for Respiratory Care PAC is a state general purpose committee. Phil Porte is the Committee's treasurer. The Committee and Porte failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Penalty: \$537 (Tier One).**

In the Matter of Friends of Salvador Alatorre for City Treasurer 2020 and Salvador Alatorre; FPPC No. 21/117. Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Salvador Alatorre was an unsuccessful candidate for Lynwood City Treasurer in the November 3, 2020 General Election. Friends of Salvador Alatorre was Alatorre's candidate-controlled committee. The Committee and Alatorre failed to timely file a 24-hour report, in violation of Government Code Section 84203 (1 count). **Total Penalty: \$475 (Tier Two).**

In the Matter of Christopher Apodaca; FPPC No. 19/1327. Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Christopher Apodaca, a Board Member for ABC Unified School District, failed to timely file an Officeholder Campaign Statement Short Form (Form 470) for calendar years 2019 and 2020, in violation of Government Code Section 84206 (2 counts). **Total Penalty: \$400 (Tier One).**

In the Matter of Scott Blough; FPPC No. 21/535. Staff: Angela Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Scott Blough, as a Board Member for Simi Valley Unified Board of Education, failed to timely file an Officeholder Campaign Statement Short Form (Form 470) for calendar years 2019 and 2020, in violation of Government Code Section 84206 (2 counts). **Total Penalty: \$400 (Tier One).**

In the Matter of Grynchal for Claremont City Council 2017, Anthony Grynchal, and Annie Baenen; FPPC No. 17/010. Staff: Jenna C. Rinehart, Commission Counsel and Jeffrey Kamigaki, Supervising Special Investigator. Anthony Grynchal was an unsuccessful candidate for Claremont City Council in the March 7, 2017 Special Election. Grynchal for Claremont City Council 2017 was Grynchal's candidate-controlled committee. Annie Baenen was the Committee's treasurer. The Committee, Grynchal, and Baenen failed to timely file an amendment to its statement of organization to report its date of qualification, in violation of Government Code Section 84101 (1 count) and failed to accurately report expenditures on a semi-annual campaign statement, in violation of Government Code Section 84211 (1 count). Additionally, Grynchal failed to timely report a source of income on a Candidate Statement of Economic Interests, in violation of Government Code Sections 87201 and 87207 (1 count). **Total Penalty: \$402 (Tier One).**

In the Matter of Pete Graff for City Council 2018, Pete Graff, and April Graff; FPPC No. 18/1378. Staff: Jenna C. Rinehart, Commission Counsel. Pete Graff was an unsuccessful candidate for Tehachapi City Council in the November 6, 2018 General Election. Pete Graff for City Council 2018 was Graff's candidate-controlled committee. April Graff was the Committee's

treasurer. The Committee, Graff, and Graff failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$240 (Tier One).**

In the Matter of Juan Blanco for Palmdale City Council District #1, 2020 and Juan Blanco; FPPC No. 21/635. Staff: Angela Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Juan Blanco was an unsuccessful candidate for Palmdale City Council in the November 3, 2020 General Election. Juan Blanco for Palmdale City Council District #1, 2020 was Blanco's candidate-controlled committee. The Committee and Blanco failed to timely file a preelection campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$249 (Tier One).**

In the Matter of Gloria Gray; FPPC No. 21/561. Staff: Angela Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Gloria Gray, as a candidate for Board Member of West Basin Water District in 2022, failed to timely file a Candidate Intention Statement, in violation of Government Code Section 85200 (1 count). **Total Penalty: \$200 (Tier One).**

Statement of Economic Interests Late Filer

In the Matter of Pablo Villagrana; FPPC No. 20/633. Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Assistant Political Reform Consultant. Pablo Villagrana, a Board Member for the Capital Improvement Project Oversight Board, failed to timely file an Assuming Office and 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: \$400 (Tier One).**

In the Matter of Maria Contreras; FPPC No. 21/068. Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Assistant Political Reform Consultant. Maria Contreras, Treasurer for the City of Baldwin Park, 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 Timothy Wilkes; FPPC No. 21/075. Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Assistant Political Reform Consultant. Timothy Wilkes, a Planning Commissioner for the City of Calistoga, 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 Luis Natividad; FPPC No. 21/427. Staff: Angela Brereton, Chief of Enforcement and Taylor Culberson, Assistant Political Reform Consultant. Luis Natividad, a Planning Commissioner for National City, 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 Scott Gallion; FPPC No. 21/466. Staff: Angela Brereton, Chief of Enforcement and Taylor Culberson, Assistant Political Reform Consultant. Scott Gallion, a Board Member with the Fall River Mills Fire Protection District in Shasta County, 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).**

Statement of Economic Interests Late Reporter

In the Matter of Acquanetta Warren; FPPC No. 21/597. Staff: Angela Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Acquanetta Warren, as Mayor of Fontana, failed to timely disclose sources of income, travel payments, and gifts on the 2018, 2019, and 2020 Annual Statements of Economic Interest, in violation of Government Code Sections 87206 and 87207 (9 counts). **Total Penalty: \$900 (Tier One).**

In the Matter of Anjali Kausar; FPPC No. 17/118. Staff: Bridgette Castillo, Senior Commission Counsel and George Aradi, Special Investigator. The respondent was represented by James Sutton of Sutton Law Firm. Anjali Kausar, as a Member of the Cupertino Unified School District, failed to timely report a source of income on the 2015 and 2016 Annual Statements of Economic Interest, in violation of Government Code Section 87302 (2 counts). **Total Penalty: \$200 (Tier One).**

In the Matter of Tammy Kim; FPPC No. 21/503. Staff: Angela Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Tammy Kim, as a member of the Irvine City Council, failed to timely report a source of income on an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). **Total Penalty: \$100 (Tier One).**

Gift Over-the-Limit

In the Matter of Shamann Walton; FPPC No. 21/622. Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Shamann Walton, a member of the San Francisco Board of Supervisors, accepted a gift that exceeded the 2020 annual gift limit, in violation of Government Code Section 89503 (1 count). **Total Penalty: \$600 (Tier Two).**

In the Matter of Holly J. Mitchell; FPPC No. 21/624. Staff: Angela Brereton, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Holly J. Mitchell, as a California State Senator, accepted two gifts that exceeded the 2019 annual gift limit, in violation of Government Code Section 89503 (2 counts). **Total Penalty: \$400 (Tier One).**

II. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

California State Association of Counties and California School Boards Association v. FPCC
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. The reporter's transcript has been filed and the briefing schedule has been set. After a stipulation to extend the filing of the opening brief by 60 days, the briefing schedule is now: opening brief due November 1, 2021; respondent's brief due December 1, 2021; reply brief due December 21, 2021. These dates do not account for extensions of time by stipulation or court order, or the automatic 15-day extension of time under in Rule 8.220 of the California Rules of Court.

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. Petitioner filed an amended petition on May 12,

2021. The Commission filed a demurrer to the amended petition. A hearing has been set for December 10, 2021, at 8:30 a.m. in Department 65 before Judge Ronald F. Frazier.

B. Outreach and Training

Webinars

- August 11th, the FPPC hosted a Candidate/Treasurer webinar. Political Reform Consultants, Alex Castillo, and Adam Ramirez, presented. 12 people attended.
- August 25th, the FPPC hosted a Campaign Filing Officer webinar. Political Reform Consultants, Katie Trumbly and Adam Ramirez, presented. 21 people attended.
- August 26th, the FPPC hosted a Statement of Economic Interests (Form 700) Gifts/Travel, Conflicts of Interest, and Section 1090 webinar. Commission Counsel, Matthew Christy and Political Reform Consultant, Katie Trumbly presented. 25 people attended.

Scheduled Webinars

- September 14th, the FPPC is hosting a Candidate/Treasurer Webinar.
- September 22nd, the FPPC is hosting a Campaign Filing Officer Webinar
- September 29th, the FPPC is hosting a Statement of Economic Interest Filing Officer webinar.

Video Tutorials

- Commission video tutorials were accessed a total of 329 times in August. Form 700 videos were accessed 191 times, the Candidate/Treasurer video was accessed 100 times, and the filing officer videos were accessed 38 times.

C. Advice

The August 27, 2021, Advice Letter Report is available at [Advice Letter Report – August 2021 \(ca.gov\)](https://www.ca.gov).

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

- **Education Program:** The Education Program responded to 415 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 519 email and telephone requests for advice, 65 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 seven.
- **Section 1090 Letters:** The Legal Division received seven advice letter request concerning Section 1090 and completed nine. This year to date, we have received 47 advice requests regarding Section 1090.

D. Miscellaneous Decisions

Regulation 18740 Exemption Requests

Regulation 18740 provides that an official or candidate is not required to disclose the name of a person under Section 87207 if disclosure would violate California or Federal law. The following exemptions were approved on August 12, 2021.

- Daralyn Durie, Consultant to the California Public Employees' Retirement System.
- Ragesh Tangri, Consultant to the California Public Employees' Retirement System.

E. Potential Upcoming Regulations

October 21, 2021

- **Behested Payment Reporting.** (Regulations 18215.3, 18424, 18424.1, 18424.2., and 18424.3.) Regulatory additions and amendments to improve the efficiency and transparency of behested payment reporting, including enhancing disclosure of relationships between parties to a behested payment, providing for reporting of good faith estimates of payments in certain circumstances, clarifying rules for disclosure of payments made in response to third party fundraising solicitations, and defining "payor" for payments made via a donor advised fund. (Adoption.)

November 18, 2021

- **Lobbyist Recordkeeping.** (Regulations 18610, 18612, and 18615.) Update and enhance recordkeeping requirements for lobbyists and lobbying entities. (Adoption.)
- **Electronic Signatures.** (Regulations 18104, 18115, 18115.2 18723.1, and 18757.) Regulatory additions and amendments permitting the use of electronic signatures on various FPPC forms. (Adoption.)

- Amplification of Online Communications. (Regulation 18421.10.) New regulation requiring additional disclosure on statements and reports when a committee makes a payment for the amplification of an electronic advertisement or online communication. (Adoption.)

F. Conflict of Interest Codes

Adoptions and Amendments

State Agency Conflict of Interest Codes

- Legislative Counsel Bureau
- State Public Defender

Multi-County Agency Conflict of Interest Codes

- Alameda Contra Costa Transit District
- CA Joint Powers Insurance Authority
- Central CA Alliance for Health
- Consolidated Irrigation District
- Consolidated Mosquito Abatement District
- El Dorado Irrigation District
- Elsinore Valley Water District
- Golden Gate Bridge, Highway and Transportation District
- Kings River East Groundwater Sustainability Agency
- Navigator Schools
- San Bernardino Community College District
- San Joaquin Valley Unified Air Pollution Control District
- Trindel Insurance Fund

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 Bernard Dory, Case Nos. 16/19886 and 19/601.** On August 17, 2021, probable cause was found to believe Respondent committed the following violations of the Act:

Count 1: Respondent failed to timely file a 2019 Annual SEI by the June 1, 2020, due date, in violation of Government Code Section 87300.

Count 2: Respondent failed to timely file a Leaving Office SEI by the December 30, 2020, due date, in violation of Government Code Section 87300.

- 2. In the Matter of Blanca Lopez for Perris City Council 2018; Blanca Lopez, Case No. 2019-988.** On September 1, 2021, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: The Committee and Lopez failed to timely file an amendment to the Committee's statement of organization within 10 days of the qualification as a committee, in violation of Government Code Section 84103, subdivision (a).

Count 2: The Committee and Lopez failed to timely file the Committee's semi-annual campaign statement for the reporting period of January 1, 2018 through June 30, 2018, due on July 31, 2018, in violation of Government Code Section 84200.

Count 3: The Committee and Lopez failed to timely file the Committee's pre-election campaign statement due October 25, 2018 for period of September 23, 2018 through October 20, 2018, in violation of Section 84200.5, subdivision (a); and 84200.8, subdivision (b).

Count 4: The Committee and Lopez failed to timely file the Committee's semi-annual campaign statement for the reporting period of October 21, 2018 through December 31, 2018, due on January 31, 2019, in violation of Government Code Section 84200.

Count 5: The Committee and Lopez failed to timely file the Committee's semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019, due on July 31, 2019, in violation of Government Code Section 84200.

Count 6: The Committee and Lopez failed to timely file the Committee's semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019, due on January 31, 2020, in violation of Government Code Section 84200.

Count 7: The Committee and Lopez failed to timely file the Committee's semi-annual campaign statement for the reporting period of January 1, 2020 through June 30, 2020, due on July 31, 2020, in violation of Government Code Section 84200.

Count 8: The Committee and Lopez failed to timely file the Committee's semi-annual campaign statement for the reporting period of July 1, 2020 through December 31, 2020, due on February 1, 2021, in violation of Government Code Section 84200.

Count 9: The Committee and Lopez failed to timely file a 24-hour contribution report for a contribution in the amount of \$2,500 received on October 9, 2018, in violation of Section 84203.

III. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: LORESSA HON, CHIEF OF ADMINISTRATION

New Employee Report

Enforcement Division

Ginny Lambing, Political Reform Consultant II (Promotion)

Legal Division

Maria Almaraz-Mirazo, Associate Governmental Program Analyst (Promotion)

Statement of Economic Interest (Form 700)

As of September 1, 2021, there were 310 Form 700 non-filers of the 2020/2021 Annual Form 700 filing. The Statement of Economic Interest Unit has made 47 non-filer referrals to the Enforcement Division.