



# EXECUTIVE STAFF REPORTS

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*June 16, 2022 Commission Hearing*

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# I. ENFORCEMENT DIVISION

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STAFF: ANGELA BRERETON, CHIEF

## A. Overview

During the period of May 1, 2022 through May 31, 2022 the Enforcement Division received 154 complaints, opened 21 for investigation, and rejected 32. The Enforcement Division received 107 referrals during this time. The Enforcement Division closed a total of 65 cases including:

- 34 warning letters – advertisement violations (4), campaign violations (8), conflict of interest code violations (1), recordkeeping violation (1), and statement of economic interests violations (20);
- 18 no action closure letters alleging – advertisement violation (1), campaign violations (6), conflict of interest (3), and statement of economic interests violations (8);
- 13 approved stipulations from the March, April, and May Commission meetings;

The Division had 1,477 cases in various stages of resolution at the time of the May Monthly Report and currently has approximately 1,484 cases in various stages of resolution, including the 14 cases before the Commission as listed in the June 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 2021, in which the Enforcement Division had a 16% increase in Streamline Penalties compared to 2020 after the Commission updated the Streamline Program regulations with the goal of making the Streamline Program more inclusive. 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.

	<b>Year</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
1	Complaints Received	564	1,352	744	1,390	606
2	Referrals Received	1,616	1,529	1,950	1,518	1,751
3	Total Complaint and Referrals Received	2,180	2,881	2,694	2,908	2,357
4	Cases opened	1,480	1,561	1,820	1,155	1,185
5	Cases closed <sup>3</sup>	1,477	1,243	1,465	1,526	1,058
6	Cases with penalties <sup>1</sup>	340	235	343	278	269
	a Streamline cases	262	173	263	194	234
	b Mainline cases	66	56	73	77	32
	c Default cases	12	6	7	7	3
7	Total fines imposed	\$1,126,933	\$499,606	\$797,384	\$1,940,107	\$472,248
8	Warning letters issued	505	554	584	777	475
9	Administrative terminations	297	177	104	62	59
10	Cases closed with violations found <sup>2</sup>	1,142	966	1,031	1,117	803
1	Advisory letters issued	17	20	9	7	16
12	No action closure letters	318	252	423	402	237

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<sup>1</sup> Total for lines 6a, 6b, and 6c.

<sup>2</sup> Total for lines 6, 8, and 9.

<sup>3</sup> 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. Prior Year's Workload – 2022 Quarterly Summary

Year Opened	Jan-22	Year Opened	Apr-22	Difference in Case Workload
	Existing Case Workload		Existing Case Workload	
2015	1	2015	0	-1
2016	12	2016	10	-2
2017	28	2017	19	-9
2018	195	2018	174	-21
2019	287	2019	268	-19
2020	381	2020	361	-20
2021	561	2021	476	-85

### 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 the following streamline cases presented with this report: In the Matter of Lassen County Republican Central Committee; FPPC No. 18/178 [The total penalty meets or exceeds the total amount raised or spent by the filer; the total penalty exceeds the amount that would be paid in a Mainline Stipulation; and the lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact].

### Recordkeeping

**[In the Matter of Lassen County Republican Central Committee, Christine Lee, and Patricia Ferne; FPPC No. 18/178.](#)** Staff: Theresa Gilbertson, Senior Commission Counsel and Kaitlin Osborn, Special Investigator. Lassen County Republican Central Committee is a state political party committee. Christine Lee served as the treasurer from June 15, 2015 through March 5, 2020 and Patricia Ferne served as the treasurer from March 5, 2020 through August 19, 2021. The Committee and Lee failed to timely file four semi-annual statements in violation of Government Code Section 84200 (4 counts); one pre-election statement, in violation of Government Code Section 84200.5 (1 count); and failed to maintain adequate records to file

campaign statements, in violation of Government Code Section 84104 (5 counts). The Committee and Ferne failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Penalty: \$2,459.**

### **Campaign Late Filer**

**[In the Matter of Barry Chang for Santa Clara County Board of Education 2022 and Barry Chang; FPPC No. 21/1149.](#)** Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Political Reform Consultant. Barry Chang is a candidate for the Santa Clara County Board of Education in the November 8, 2022 General Election. Barry Chang for Santa Clara County Board of Education 2022 is his candidate-controlled committee. The Committee and Chang failed to timely file three semi-annual campaign statements, in violation of Government Code Section 84200 (3 counts). **Total Penalty: \$1,200 (Tier Two).**

**[In the Matter of Friends of El Segundo Schools – Yes on Measure ES 2018, and Chris Powell; FPPC No. 18/997.](#)** Staff: Alex Rose, Commission Counsel. Friends of El Segundo Schools – Yes on Measure ES 2018 is a primarily formed ballot measure committee in support of Measure ES, a successful bond measure on the November 6, 2018 General Election. Chris Powell is the Committee's treasurer. The Committee and Powell failed to timely file two 24-hour contribution reports, in violation of Government Code Section 84203 (2 count). **Total Penalty: \$980 (Tier Two).**

**[In the Matter of Tom Huff for School Board 2020, and Tom Huff; FPPC No. 21/634.](#)** Staff: Marissa Nash, Commission Counsel. Tom Huff, candidate for Evergreen Elementary Board of Trustees failed to timely file three 24-hour contribution reports, in violation of Government Code Section 84203 (3 counts). **Total Penalty: \$805 (Tier One).**

**[In the Matter of Committee to Oppose Measure E, and James R. Nyman; FPPC No. 18/206.](#)** Staff: Christopher B. Burton, Assistant Chief of Enforcement and Lance Hachigian, Special Investigator. Committee to Oppose Measure E was a committee primarily formed to oppose Palos Verdes Estates Measure E for the the April 10, 2018 Special Municipal Election. James R. Nyman served as the principal officer and treasurer of the Committee. The Committee and Nyman failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count); failed to timely report contributions and expenditures on a semi-annual campaign statement, in violation of Government Code Section 84211 (1 count); and failed to timely file an amendment to the Committee's Statement of Organization after the Committee qualified, in violation of Government Code Section 84103 (1 count). **Total Penalty: \$598 (Tier One).**

**[In the Matter of James Wright, Janice Wright, and James R. Wright for Trustee South Orange County Community College District 2020; FPPC No. 20/1139.](#)** Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. James Wright was a successful candidate for the South Orange County Community College District Board in the November 3, 2020 General Election. James R. Wright for Trustee South Orange County Community College District 2020 is Wright's candidate-controlled committee. Janice Wright is the committee's treasurer. The Committee, Wright, and Wright failed to timely file a pre-election campaign

statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$474 (Tier One).**

**In the Matter of Silicon Valley Latino Democratic Forum, and Lee Ross Gomez, Jr.; FPPC No. 21/094.** Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Silicon Valley Latino Democratic Forum is a local general purpose committee. Lee Ross Gomez, Jr. is the committee's Treasurer. The Committee and Gomez failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). **Total Penalty: \$400 (Tier Two).**

**In the Matter of Josie Calderon-Scott for Water Board 2020, Josie Calderon-Scott, and Richard Scott; FPPC No. 20/1053.** Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Political Reform Consultant. Josie Calderon-Scott was a successful candidate for the South Bay Irrigation District Board of Directors in the November 3, 2020 General Election. Josie Calderon-Scott for Water Board 2020 was her candidate-controlled committee. Richard Scott was the Committee's treasurer. The Committee, Calderon-Scott, and Scott failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). Total Penalty: \$251 (Tier One).

#### **Statement of Economic Interests Late Filer**

**In the Matter of Dexter Jackson; FPPC No. 19/1226.** Staff: David E. Castro, Commission Counsel. Dexter Jackson, Senior Plumbing Building Inspector for the City of Los Angeles Department of Building & Safety, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$400 (Tier One).**

**In the Matter of Moorea Hoffman; FPPC No. 19/1586.** Staff: David E. Castro, Commission Counsel. Moorea Hoffman, Planning Commissioner for the City of Plumas, failed to timely file an Assuming Office Statement of Economic Interests and a 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: \$400 (Tier One).**

#### **Statement of Economic Interests Late Reporter**

**In the Matter of Richard Kuhns; FPPC No. 22/247.** Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Richard Kuhns, Chief Administrative Officer of Trinity County, failed to timely report one source of income on their 2020 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). Total Penalty: \$100 (Tier One).

## II. AUDITS AND ASSISTANCE DIVISION

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STAFF: SHRDHA SHAH, CHIEF

### A. Overview

The audit reports prepared by the FPPC summarize findings with respect to the filer's conformity with the disclosure and recordkeeping requirements of the Political Reform Act. Copies of audit reports are always sent to the auditees and those included in the audit report (such as the prior treasurer, current treasurer and/or their representatives). These reports are public documents.

### B. Current Period Updates

During the period of May 1, 2022, through May 31, 2022, no new audit reports were adopted by the Audits and Assistance Division. Currently the team has 35 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

### C. Personnel Update

During the month, the Division accepted the resignation of one audit staff member, resulting in transfer of workload to the current team members. The Division is currently in the process of recruiting a new Staff Services Management Auditor to fill the vacancy.

## III. LEGAL DIVISION

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STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

### A. Pending Litigation

***Mat Wahlstrom v. FPPC, Steven J. Kaufman and Kaufman Legal Group, APC***

San Diego County Superior Court, Central Division

Case No. 37-2020-00030654-CU-WMCTL

Petitioner filed a petition for writ of mandate on August 31, 2020. The petition sought to set aside a streamline stipulation, decision and order against Todd Gloria adopted by the Commission in November 2019. The Attorney General represented the Commission. The Commission timely filed an answer to the complaint. Petitioner filed an amended petition on May 12, 2021. The Commission filed a demurrer to the amended petition, the parties submitted briefs and at a hearing on December 13, 2021.

On March 17, 2022, the court issued a tentative ruling sustaining the Commission's demurrer without leave to amend the petition. Petitioner did not request a hearing to contest the tentative ruling, thus the tentative will become the court's final ruling. On April 4, 2022, the court entered a judgment. The time to file an appeal has not yet run out.

### B. Outreach and Training

#### *Webinars*

- May 12, the FPPC hosted local contribution limits webinar. Education and External Affairs Manager, Chloe Hackert, presented. 4 people attended.
- May 17, the FPPC presented a Statement of Economic Interests Filers workshop requested by the California Sheriffs' Association. Political Reform Consultant, Katie Trumbly, presented. 20 people attended.
- May 19, the FPPC hosted a Candidate/Treasurer webinar. Political Reform Consultants, Adam Ramirez and Alex Castillo, presented. 9 people attended.
- May 24, the FPPC hosted a Campaign Filing Officer webinar. Political Reform Consultants, Stephen Hernandez and Katie Trumbly, presented. 11 people attended.
- May 24, Chair Richard Miadich and General Counsel Dave Bainbridge participated in a presentation hosted by the Institute for Local Government about ballot measure campaigns by local agencies.

#### *Scheduled Webinars*

- June 15, the FPPC is hosting a Candidate/Treasurer webinar.
- June 21, the FPPC is hosting a Campaign Filing Officer webinar.
- June 30, the FPPC is hosting a Statement of Economic Interests Filers webinar.



### *Video Tutorials*

Commission video tutorials were accessed a total of 399 times in May. Form 700 videos were accessed 158 times, the Candidate/Treasurer video was accessed 176 times, and the filing officer videos were accessed 65 times.

### **C. New and Updated Educational Resources**

- Updated and expanded the Campaign Advertisements by Government Agencies page: <https://www.fppc.ca.gov/learn/campaign-rules/campaign-related-communications-at-public-expense.html>.

### **D. Advice**

The May Advice Letter Report is available on the FPPC website at <https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2022-advice-letter-reports/FPPC-advice-letter-report-may-2022.html>.

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

- **Education:** The Education unit responded to 475 requests for technical assistance via telephone.
- **Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 604 email requests for advice, 113 of which were not responded to within 24 hours.
- **Advice Letters:** The Legal Division received 10 advice letter requests under the Political Reform Act and completed 15.
- **Section 1090 Letters:** The Legal Division received 6 advice letter request concerning Section 1090 and completed 2. This year to date, we have received 16 advice requests regarding Section 1090.

### **E. Miscellaneous Decisions**

#### **SEI Exemption Request**

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 exemption was approved in May:

- Sheela Stark, Candidate for State Assembly, District 50. Certain clients of her law firm were exempt from disclosure as sources of income on her Form 700.

## F. Potential Upcoming Regulation Projects

### *July*

- Filing Officer Referrals - Provide specific criteria and requirements for filing officials submitting referrals to the Enforcement Division for campaign finance, SEI, behested payment, and lobbying reporting violations (adoption).
- Press Policy – Provide specific rules governing the level of detail provided to the press and public regarding the status of pending Enforcement cases (adoption).
- Cryptocurrency - Consider revising prohibition on making and receiving campaign contributions via cryptocurrency (adoption).
- Bank account signor disclosure - Require disclosure of authorized signors for campaign bank accounts on a statement of organization (pre-notice).

### *August*

- Direct Personal Benefit definition – Update the regulatory definition of “direct personal benefit” to reflect amendments made to Section 89521 by AB 1367, as well as other minor clean-up of existing regulations (adoption).
- Recall Election - Various new regulations to address ambiguities and gaps in the application of the Act’s disclosure provisions in recall elections (pre-notice).

For more information on these and other regulation projects planned for 2022, go to <https://www.fppc.ca.gov/the-law/fppc-regulations.html>.

## G. Conflict of Interest Codes

### **Adoptions and Amendments**

#### *Multi-County:*

- Statewide Association of Community Colleges JPA
- Western Educational Corp.

#### *State:*

- Housing & Community Development Department
- California Horse Racing Board
- Franchise Tax Board

### **Exemptions**

None

### **Extensions**

None

## H. Probable Cause Hearings

*Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause does not constitute a finding a violation occurred. Respondents are presumed innocent of any violation of the Act unless a violation is proven in a subsequent proceeding.*

***In the Matter of Siskiyou Alternative Medicine Opposing Measures T & U, Anne Walent, and Wayne Walent, Case No. 16/440.*** On May 24, 2022, probable cause was found, after a probable cause conference on May 17, 2022, that Respondents committed the following violations of the Act:

Count 1: On or about April 4, 2016, the Committee, Anne, and Wayne failed to timely file a statement of organization, in violation of Government Code Section 84101.

Count 2: On or about April 4, 2016, the Committee, Anne, and Wayne failed to timely disclose, on its late-filed statement of organization, the date the Committee qualified as a committee, in violation of Government Code Section 84101, subdivision (a), and Regulation 18410, subdivision (a)(1).

Count 3: The Committee, Anne, and Wayne failed to timely file the first pre-election campaign statement for the reporting period of January 1, 2016 to April 23, 2016, by the April 28, 2016 due date, in violation of Government Code Sections 84200.5, subdivision (a), and 84200.8.

Count 4: The Committee, Anne, and Wayne failed to timely file the second pre-election campaign statement for the reporting period of April 24, 2016 to May 21, 2016, by the May 26, 2016 due date, in violation of Government Code Sections 84200.5, subdivision (a), and 84200.8.

Count 5: The Committee, Anne, and Wayne failed to timely file a 24-hour contribution report for a \$2,000 contribution received on or about April 18, 2016, by the April 19, 2016 due date, in violation of Government Code Section 84203, subdivision (b).

Count 6: During or about reporting periods occurring between January 1, 2016 and June 30, 2016, the Committee, Anne, and Wayne failed to report contributions received totaling at least \$1,350.43 and expenditures totaling at least \$4,330.50, in violation of Government Code Section 84211, subdivisions (a) and (b).

Count 7: Dismissed by complainant.

Count 8: During or about reporting periods occurring between January 1, 2016, and June 30, 2016, the Committee, Anne, and Wayne failed to maintain detailed campaign records for contributions received totaling at least \$7,456.68, and for expenditures totaling at least \$2,067.50, in violation of Government Code Section 84104 and Regulation 18401, subdivision (a).

Count 9: During or about reporting periods occurring between January 1, 2016 and June 30, 2016, the Committee, Anne, and Wayne paid for at least ten expenditures in cash of \$100 or more totaling \$7,956.68, in violation of Government Code Section 84300, subdivision (b).

Count 10: In or about March to June 2016, the Committee, Anne, and Wayne failed to include the required disclosure statement on campaign flyer advertisements, in violation of Government Code Section 84504, subdivision (c), and Regulation 18450.4, subdivision (b).

Count 11: In or about March to May 2016, the Committee, Anne, and Wayne failed to include the required disclosure statement on campaign yard sign advertisements, in violation of Government Code Section 84504, subdivision (c), and Regulation 18450.4, subdivision (b).

Count 12: In or about March to May 2016, the Committee, Anne, and Wayne failed to include the required disclosure statement on campaign newspaper advertisements, in violation of Government Code Section 84504, subdivision (c), and Regulation 18450.4, subdivision (b).

Count 13: In or about March to June 2016, the Committee, Anne, and Wayne failed to include the required disclosure statement on campaign television advertisements, in violation of Government Code Section 84504, subdivision (c), and Regulation 18450.4, subdivision (b).

*The following matter was decided based solely on the papers. The respondents did not request or failed to appear at a probable cause hearing.*

***In the Matter of Anna Song and Friends of Anna Song for County Board Of Education for 2020, Case No. 20/950.*** On May 10, 2022, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date, in violation of Government Code Section 84200.

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

Count 3: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2018 to December 31, 2018, by the January 31, 2019 due date, in violation of Government Code Section 84200.

Count 4: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation of Government Code Section 84200.

Count 5: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 to December 31, 2019, by the January 31, 2020 due date, in violation of Government Code Section 84200.

- Count 6: The Committee and Song failed to timely file a pre-election campaign statement for the reporting period of January 1, 2020 to January 18, 2020, by the January 23, 2020 due date, in violation of Government Code Sections 84200.5 and 84200.8 and Regulation 18405.
- Count 7: The Committee and Song failed to timely file a pre-election campaign statement for the reporting period of January 19, 2020 to February 15, 2020, by the February 20, 2020 due date, in violation of Government Code Sections 84200.5 and 84200.8 and Regulation 18405.
- Count 8: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of February 16, 2020 to June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Section 84200.
- Count 9: The Committee and Song failed to timely file a pre-election campaign statement for the reporting period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 10: The Committee and Song failed to timely file a pre-election campaign statement for the reporting period of September 20, 2020 to October 17, 2020, by the October 22, 2020 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 11: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 to June 30, 2021, by the August 2, 2021 due date, in violation of Government Code Section 84200.
- Count 12: The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 to December 31, 2021, by the January 31, 2022 due date, in violation of Government Code Section 84200.
- Count 13: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late monetary contribution, totaling \$4,410, received on August 6, 2020, by the August 7, 2020 due date, in violation of Government Code Section 84203.
- Count 14: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late monetary contribution, totaling \$6,000, received on August 7, 2020, by the August 10, 2020 due date, in violation of Government Code Section 84203.
- Count 15: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late monetary contribution, totaling \$10,000, received on September 25, 2020, by the September 28, 2020 due date, in violation of Government Code Section 84203.
- Count 16: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose two late monetary contributions, totaling \$2,000, received on October 3, 2020, by the October 5, 2020 due date, in violation of Government Code Section 84203.
- Count 17: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$22,440, received on October 5, 2020, by the October 7, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.

- Count 18: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$40,000, received on October 8, 2020, by the October 12, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 19: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$4,000, received on October 11, 2020, by the October 13, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 20: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$22,440, received on October 13, 2020, by the October 15, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 21: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$15,088, received on October 15, 2020, by the October 19, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 22: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$21,944, received on October 21, 2020, by the October 23, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 23: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late non-monetary contribution, totaling \$21,937, received on October 26, 2020, by the October 28, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.

## **IV. ADMINISTRATION & TECHNOLOGY DIVISION**

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STAFF: LORESSA HON, CHIEF

### **A. New Employee Report**

#### **Enforcement Division**

Stacey Anderson-Wise, Management Services Technician

#### **Legal Division**

Edgar Ramirez, Staff Services Analyst

### **B. Statement of Economic Interest (Form 700)**

As of June 1, 2022, 844 persons who were required under their state or local agency conflict of interest code to file a 2021/2022 Annual Form 700 had not timely done so. FPPC staff is in the process of evaluating these non-filers for enforcement action.