



EXECUTIVE STAFF REPORTS

January 16, 2025, Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: JAMES M. LINDSAY, CHIEF OF ENFORCEMENT

A. Overview

During the period of November 1, 2024, through December 31, 2024, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	62	18	79	251

The number of complaints received by the Enforcement Division slowed following the election while the number of referrals was similar to previous months in 2024.

For the months of November and December, more time to respond beyond the 14-day statutory period was needed for approximately 24 sworn complaints. Generally, additional time to respond was utilized in order to give respondents more time to respond to inquiries when it was requested.

Additionally, for the months of November and December, the Enforcement Division opened 226 cases, rejected 244 complaints and referrals, and closed a total of 332 cases including:

- 202 warning letters – advertisement violations (18), campaign violations (29), conflict of interests (1), and statement of economic interests violations (154);
- 53 no action closure letters: PREP completed – statement of economic interests violations (42); campaign violations (8), and advertisement violations (3);
- 41 no action closure letters alleging – advertisement violations (8), campaign violations (6), behested payment violation (1), conflicts of interests (10), and statement of economic interests violations (16);
- 16 approved stipulations from the November Commission meeting;
- 3 approved defaults from the September Commission meeting;
- 3 advisory letters;
- 12 administrative terminations;
- 2 cases closed as a duplicates.

The Division had a total of 926 cases in various stages of resolution at the time of the November Monthly Report and currently has approximately 820 cases in various stages of resolution, including the 13 streamline cases and 2 mainline cases before the Commission as listed in the January Agenda. Net case closures since the last monthly report totaled 106.

B. Annual Statistics

The following is a chart that details the annual statistics for enforcement complaints, referrals and cases over the past six years. The statistics show a marked increase in complaints during election years while referrals were reduced in 2024.

	Year	2019	2020	2021	2022	2023	2024
1	Complaints Received	744	1,390	606	1,379	653	1,452
2	Referrals Received	1,950	1,518	1,751	1,724	1,971	1,387
3	Total Complaint and Referrals Received	2,694	2,908	2,357	3,103	2,624	2,839
4	Cases opened	1,820	1,155	1,185	990	831	1,402
5	Cases closed ³	1,465	1,526	1,058	1,075	1,295	1,536
6	Cases with penalties ¹	343	278	269	161	98	149
a	Streamline cases	263	194	234	142	79	117
b	Mainline cases	73	77	32	14	17	25
c	Default cases	7	7	3	5	2	7
7	Total fines imposed	\$797,384	\$1,940,107	\$472,248	\$617,548	\$376,531	\$802,238
8	Warning letters issued	584	777	475	681	813	847
9	Administrative terminations	104	62	59	53	87	80

¹ Total for lines 6a, 6b, and 6c.

10	Cases closed with violations found ²	1,031	1,117	803	895	998	1,054
11	Advisory letters issued	9	7	16	8	15	12
12	No action closure letters	423	402	237	217	296	469
a	PREP Completed	--	--	--	39	86	261

C. 2023-2024 Quarterly Caseload Summary

The following is a chart that compares the number of cases from given years at the end of each quarter during 2024. Enforcement has successfully focused on the resolution of older cases.

	December 2023	March 2024	June 2024	September 2024	December 2024	Difference in Existing Caseload Overall
2017	1	0	0	0	0	-1
2018	21	12	8	8	5	-16
2019	39	23	22	21	12	-27
2020	153	118	103	84	40	-113
2021	167	148	124	105	68	-99
2022	248	213	191	165	131	-117
2023	323	276	260	236	194	-129

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. Presentations

Council on Government Ethics Laws (COGEL) Annual Conference in Los Angeles: James M. Lindsay, Chief of Enforcement, presented on two panels: 1) Settlement Showdown: The Views from Both Sides and 2) One Size Does Not Fit All: Appropriate Penalties and Remedies.

E. 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.

Campaign Bank Account

In the Matter of Paul Courtney and Committee to Elect Paul Anthony Courtney for Mayor in 2020; FPPC No. 23/014. Staff: Alex Rose, Senior Commission Counsel and Roone Petersen, Special Investigator. Paul Anthony Courtney was a successful candidate for Mayor of Barstow in the November 3, 2020 General Election. Paul Anthony Courtney for Mayor in 2020 was Courtney's candidate-controlled committee. Gabriela Humphrey served as the Committee's treasurer. The Committee and Courtney failed to properly use campaign bank account for two semi-annual and two pre-election campaign statements, in violation of Government Code Section 85201 (4 counts). The Committee and Courtney improperly received cash contribution in the amount of \$800 from Paul Anthony Courtney, in violation of Government Code Section 84300 (1 count). The Committee and Courtney failed to timely report \$932 in expenditures on a semi-annual campaign statement for the reporting period ending on December 31, 2019, in violation of Government Code Section 84211. The Committee and Courtney failed to timely file one semi-annual and two pre-election campaign statements for the reporting periods ending on June 30, 2020, September 19, 2020, and October 17, 2020, in violation of Government Code Sections 84200 (1 count) and 84200.5 (2 counts). Chief Discretion was used in this matter to include counts 1 through 4 in tier one. **Total Penalty \$1,681 (Tier One).**

Recordkeeping

In the Matter of Women of Long Beach, Gary Crummitt, and Nadia Tushnet; FPPC No. 20/1029. Staff: Marissa Corona, Senior Commission Counsel and Kaitlin Osborn, Special Investigator. Women of Long Beach is a general purpose committee. Gary Crummitt served as

the Committee's treasurer. Nadia Tushnet served as the Committee's principal officer. The Committee, Crummitt, and Tushnet failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts), failed to timely file three pre-election campaign statements, in violation of Government Code Section 84200.5 (3 counts), failed to timely file one 24-Hour Report, in violation of Government Code Section 84204 (1 count), and failed to timely file two verification of 24-Hour Reports, in violation of Government Code Section 84213 (2 counts). The Committee, Crummitt, and Tushnet also failed to timely report subvendor payments, in violation of Government Code Section 84211 (1 count), and failed to keep adequate records for the 2020 calendar year, in violation of Government Code Section 84104 (1 count). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. Chief Discretion was used in this matter to have counts 5 through 8 be eligible for a \$0 penalty. **Total Penalty: \$1,307 (Tier One).**

Advertisements

In the Matter of Save Sonoma Jobs- No on Measure B, Bryce Skolfield, and David Wabel; FPPC No. 21/161. Staff: Laura Columbel, Commission Counsel and Kristin Hamilton, Special Investigator. Save Sonoma Jobs-No on Measure B is a primarily formed committee. Bryce Skolfield served as the Committee's treasurer. David Wabel served as the Committee's principal officer. The Committee, Skolfield, and Wabel failed to timely file a Statement of Organization, in violation of Government Code Section 84101 (1 count), twelve 24-Hour Reports, in violation of Government Code 84203 (12 counts), and seven semi-annual statements, in violation of Government Code Section 84200 (7 counts). The Committee, Skolfield, and Wabel failed to report employment and occupation information for contributions received on two pre-election statements, in violation of Government Code Section 84211(f) (2 counts). The Committee, Skolfield, and Wabel failed to include proper advertisement disclosures on mass mailings, large print ads, and the Committee's website, in violation of Government Code Sections 84305 (2 counts), 84504.2 subdivision (b) (4 counts), and 84504.3 subdivision (c) (1 count). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. Chief Discretion was used in this matter to have counts 24 and 26-29 be eligible for a \$0 penalty. **Total Penalty: \$3,742 (Tier One).**

In the Matter of Stop All Sprawl- A Committee in Support of Measure A and Oppose Measure B, Briana Baleskie, and Peter Anderson; FPPC 20/234. Staff: Cinthya Bernabé, Commission Counsel and Kristin Hamilton, Special Investigator. Stop All Sprawl- A Committee in Support of Measure A and Oppose Measure B is a primarily formed committee for the calendar year of 2020. Briana Baleskie served as the Committee's treasurer. Peter Anderson served as the Committee's principal officer. The Committee, Baleskie, and Anderson failed to timely file an amended Statement of Organization, in violation of Government Code Section 84200 (1 count), one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count), two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts), two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts), and one semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). The Committee, Baleskie, and Anderson failed to timely disclose on two pre-election campaign statements, in violation of Government Code Section 84211 (2 count). The Committee, Baleskie,

and Anderson failed to include proper advertisement disclosures on yard signs, in violation of Government Code Section 84504.2 (1 count). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$2,452 (Tier One).**

In the Matter of Glendale Coalition for Better Government, Seda Khachaturian, and Frank Gallo; FPPC No. 22/835. Staff: Marissa Corona, Senior Commission Counsel and Kaitlin Osborn, Special Investigator. Glendale Coalition for Better Government is a general purpose committee. Seda Khachaturian served as the Committee's treasurer. Frank Gallo served as the Committee's principal officer. The Committee, Khachaturian, and Gallo failed to timely file three semi-annual campaign statements, in violation of Government Code Section 84200 (3 counts), failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts), failed to timely file two 24-Hour Reports, in violation of Government Code Section 84204 (2 counts), and failed to include the proper advertisement disclosure on a yard sign, in violation of Government Code Section 84506.5 (1 count). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. Chief Discretion was used in this matter to have counts 3 through 7 be eligible for a \$0 penalty. **Total Penalty: \$641 (Tier One).**

Lobbying Reporting

In the Matter of Alzheimer's Orange County; FPPC No. 24/841. Staff: Chance Felkins, Commission Counsel. Alzheimer's Orange County is a lobbyist employer. Alzheimer's Orange County failed to timely file seventeen lobbyist employer quarterly reports, in violation of Government Code Section 86117 (17 counts). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as \$0 penalty. Chief Discretion was used in this matter to include counts 4 and 7 through 11 in tier one. **Total Penalty \$1,618 (Tier One).**

Campaign Late Filer

In the Matter of South Cord Management LLC and Elliot Lewis; FPPC No. 20/1038. Staff Chance Felkins, Commission Counsel. The respondents in this matter were represented by Joseph A. Guardarrama of Kaufman Legal Group. South Cord management is a Major Donor Committee. Elliot Lewis serves as the responsible officer. The Committee failed to include the responsible officer on eighteen 24-Hour Reports, in violation of California Code of Regulation, Title 2, Section 18402.2 (18 counts). The Committee failed to timely file one Major Donor Campaign Statement, in violation of Government Code Section 84200, subdivision (b), (1 count). The Committee failed to timely file six 24-Hour Reports, in violation of Government Code Section 84203 (2 counts) and 82036, 82036.5, and 84204 (4 counts). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as \$0 penalty. Chief Discretion was used to include Major Donor Late Filer counts 1, and 3 through 6 in tier one, and Major Donor Late Filer count 1 in tier two. Total Penalty \$3,900 (Tiers One & Two).

In the Matter of Paul Cook for Supervisor 2020 and Paul Cook; FPPC No. 21/102. Staff: Chance Felkins, Commission Counsel and Sonia Mangat, Program Specialist. This matter arose from an audit performed by the Audits & Assistance Division of the Fair Political Practices Commission. Paul Cook was a successful candidate for San Bernardino County Supervisor in the March 3, 2020 Primary Election. Paul Cook for Supervisor 2020 is Paul Cook's candidate-controlled committee. The Committee and Cook failed to timely report on two semi-annual campaign statements, in violation of Government Code Section 84211 (2 counts), and two pre-election campaign statements, in violation of Government Code Section 84211 (2 counts). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as \$0 penalty. **Total Penalty: \$2,037 (Tiers One and Two).**

In the Matter of Diego Garcia for Richmond City Council 2018, Diego Garcia, and Annabella Leal; FPPC No. 22/568. Staff: Laura Columbel, Commission Counsel and Roone Peterson, Special Investigator. Diego Garcia was an unsuccessful candidate for Richmond City Council in the November 6, 2018 General Election. Diego Garcia for Richmond City Council 2018 was Garcia's candidate-controlled committee. Annabella Leal served as the Committee's treasurer. The Committee, Garcia, and Leal failed to timely file eight semi-annual statements, in violation of Government Code Section 84200 (8 counts). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$1,572 (Tier One).**

In the Matter of Motecuzoma Sanchez and Sanchez for Mayor 2020; FPPC No. 21/314. Staff: Laura Columbel, Commission Counsel and Alethea Perez, Special Investigator. Sanchez was an unsuccessful candidate for the Mayor of Stockton in the March 3, 2020 Primary Election. Sanchez for Mayor 2020 was Sanchez's candidate-controlled committee. The Committee and Sanchez failed to timely file four semi-annual statements, in violation of Government Code Section 84200 (4 counts); and failed to timely file three 24-Hour Reports, in violation of Government Code Section 84203 (3 counts). In addition, Sanchez failed to timely report income on the Candidate Statement of Economic Interests, in violation of Government Code Section 87201 (1 count). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$1,093 (Tier One).**

In the Matter of Andres Ramos for College Board 2022 and Andres Ramos; FPPC No. 24/481. Staff: James M. Lindsay, Chief of Enforcement and Vanessa Greer, Political Reform Consultant. Andres Ramos was a successful candidate for the Compton Community College District in the November 8, 2022 General Election. Andres Ramos for College Board 2022 is Ramos' candidate-controlled committee and serves as the Committee's treasurer. The Committee and Ramos failed to timely file three semi-annual campaign statements, in violation of Government Code Section 84200 (3 counts). **Total Penalty: \$600 (Tier One).**

Committee Naming Requirements

In the Matter of Committee to Support the Quality Teachers, Staff & Schools Measure 2020, Yes on I, Carol Briggs, and John Echeto; FPPC No. 21/1095. Staff: Jonathan Rivera, Commission Counsel. Committee to Support the Quality Teachers, Staff & Schools Measure 2020, Yes on I was a primarily formed ballot measure committee in support of a school bond

measure that appeared on the Los Angeles County ballot for the March 3, 2020 Primary Election. John Echeto was the Committee's treasurer. The Committee, Briggs, and Echeto failed to comply with the Act's committee naming requirements on six campaign statements, in violation of Government Code Section 84107 (6 counts). Chief Discretion was used in this matter to include count 3 in tier 2 and exclude counts 4 through 6 from receiving a streamline penalty. **Total Penalty: \$2,400 (Tier Two).**

Statement of Economic Interests Late Filer

In the Matter of Tamara Vides; FPPC No. 23/449. Staff: James M. Linsday, Chief of Enforcement and Shaina Elkin, Associate Governmental Program Analyst. Tamara Vides, as a member of the Public Agency Risk Sharing Authority, Central Coast Community Energy, CA Intergovernmental Risk Authority, and as Watsonville Assistant City Manager, failed to timely file the 2020 and 2022 Annual Statements of Economic Interest, in violation of Government Code Sections 87203 and 87302 (2 counts). **Total Penalty: \$400 (Tier One).**

II. AUDITS & ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF OF AUDITS & ASSISTANCE

Audits are conducted per Government Code sections 90000 - 90008 of the Political Reform Act (the Act). The Act requires full disclosure of receipts and expenditures of candidates and committees and disclosure of the finances of lobbyists. The purpose of the audits is to determine the level of compliance of the auditees with the Act. The opinions expressed in the audit report reflect the level of compliance with the Act. The FPPC is not responsible for the contents of the candidate's documents. Audit reports are then submitted to the Enforcement Division for further review.

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 November 1, 2024, to December 31, 2024, one audit report was adopted by the Audits and Assistance Division. Currently, the team has 31 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit report adopted during the period are as follows:

1. Tiffany Moran 4 CalPERS Board 2021 (ID# 1438616)

- **Finding 1: Form 410 - Committee with Ending Cash Balance Terminated**
 - A Form 410 Statement of Termination was filed on December 21, 2021, with the Secretary of State disclosing the date of termination as November 30, 2021. The campaign bank account maintained a \$500 balance and remained open until May 17, 2022 when the \$500 was transferred to DDA Stephen Laura.
- **Finding 2: Form 460 - Semi-annual Campaign Statement Not Filed**
 - A Form 460 Semi-annual Campaign Statement was not filed for the reporting period ending June 30, 2022. In addition, the last campaign statement was filed for the period covering through November 30, 2021 instead of through December 31, 2021.
- **Finding #3: Monetary Contribution Received Over the Limit**

- A contribution received from Riverside Sheriffs' Association Public Education Fund on July 12, 2021, exceeded the contribution limits by \$4,900. The excess contribution was not returned to the donor.

C. Report on Form 807 Discretionary Audit

Staff will present results of the Form 807 Discretionary Audit conducted by the Audits and Assistance Division.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

Young v. West, Sacramento Superior Court, Case No. 24WM000132. James Young, a Water Resource Control Engineer with the State Water Resources Control Board (“Board”), appealed to the FPPC the Board’s decision not to amend the Board’s conflict of interest code to remove Mr. Young’s position from the list of designated employees required to file a Statement of Economic Interests. Executive Director West, acting on behalf of the FPPC, denied that appeal based on evidence submitted that Mr. Young’s position made or participated in governmental decisions. On September 23, 2024, Mr. Young filed a writ petition challenging the FPPC’s denial of his appeal. The FPPC filed a responsive pleading on October 9, 2024. Mr. Young subsequently filed a dismissal before any hearing, and the matter is now resolved.

B. Outreach and Training

Webinars & Workshops

November

- November 13, the FPPC presented a Campaign Filing Officer – After the Election webinar. Political Reform Consultants, Stephen Hernandez and Adam Ramirez, presented. 95 people attended.
- November 15, the FPPC presented at the California Political Treasurers Association (CPTA) annual meeting. Chair Adam E. Silver, Audits & Assistance Division Chief, Shrdha Shah, and Senior Legislative Counsel, Lindsey Nakano, presented. Approximately 40 people attended.
- November 20, the FPPC presented a Statement of Economic Interests Filing Officer and AB 1170 webinar requested by the City Clerks Association of California (CCAC). Education & External Affairs Unit Manager, Chloe Hackert, and Associate Governmental Program Analyst, Andrea Carey, presented. 100 people attended.

- November 20, the FPPC presented a Candidate/Treasurer – After the Election webinar. Political Reform Consultants, Alexandra Castillo and Adam Ramirez, presented. 45 people attended.

December

- December 4, the FPPC presented a Statement of Economic Interests Filing Officer webinar requested by California Community Choice Association. Political Reform Consultants, Stephen Hernandez and Alex Castillo, presented. 14 people attended.
- December 10, the FPPC presented a Statement of Economic Interests Filers workshop requested by the San Diego County Fair Association. Political Reform Consultant, Adam Ramirez, presented the workshop. 35 people attended.
- December 17, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants, Alex Castillo and Stephen Hernandez, presented. 220 people attended.
- December 19, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants, Adam Ramirez and Stephen Hernandez, presented. 94 people attended.

Scheduled Webinars

- January 9, the FPPC is presenting a Statement of Economic Interests Filing Officer webinar.
- January 14, the FPPC is presenting a Statement of Economic Interests Filers webinar.
- January 22, the FPPC is presenting a Candidate/Treasurer – After the Election webinar.

Video Tutorials:

November: Commission video tutorials were accessed a total of 392 times. Form 700 videos were accessed 240 times, the Candidate/Treasurer video was accessed 110 times, and the filing officer videos were accessed 42 times.

December: Commission video tutorials were accessed a total of 392 times. Form 700 videos were accessed 226 times, the Candidate/Treasurer video was accessed 61 times, and the filing officer videos were accessed 105 times.

C. New and Updated Educational Resources

- [County Central Committee Fact Sheet](#)
- [Updated 2025/2026 California State Contribution Limits Fact Sheet](#)
- [Updated 2025/2026 Voluntary Expenditure Ceilings for State Candidates Fact Sheet](#)
- Updated [State](#) and [Local](#) Gift & Travel Fact Sheets

D. Political Reform Education Program (PREP):

November

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments
Statement of Economic Interests Course	20	16	4	40
Campaign Course for Local Candidates and Candidate-Controlled Committees	4	4	0	5
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	1

December

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments
Statement of Economic Interests Course	29	22	1	46
Campaign Course for Local Candidates and Candidate-Controlled Committees	7	3	0	9
Campaign Course for State Candidates and Candidate-Controlled Committees	0	1	0	0
Advertisement Course for Candidates and Candidate-Controlled Committees	8	3	0	5

E. Advice

The [November Advice Letter Report](https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2024-advice-letter-reports.html) is available on the FPPC website at <https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2024-advice-letter-reports.html>.

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

- **Education:** The Education unit responded to 281 requests for technical assistance via telephone.
- **Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 410 email requests for advice, 141 of which were not responded to within 24 hours and 108 of those were not responded to within 48 hours.
- **Advice Letters:** The Legal Division received 8 advice letter requests under the Political Reform Act and completed 10.
- **Section 1090 Letters:** The Legal Division received 2 advice letter request concerning Section 1090 and completed 5.

The [December Advice Letter Report](https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2024-advice-letter-reports.html) is available on the FPPC website at <https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2024-advice-letter-reports.html>.

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

- **Education:** The Education unit responded to 404 requests for technical assistance via telephone.
- **Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 498 email requests for advice, 153 of which were not responded to within 24 hours and 114 of those were not responded to within 48 hours.
- **Advice Letters:** The Legal Division received 4 advice letter requests under the Political Reform Act and completed 5.
- **Section 1090 Letters:** The Legal Division received 7 advice letter requests concerning Section 1090 and completed 1. In 2024 we received 51 advice requests regarding Section 1090.

F. Miscellaneous Decisions

None

G. Upcoming Regulation Projects

February

Mandatory Electronic Filing of SEIs with the FPPC – Amend various regulations concerning filing of statements of economic interests to implement AB 1170, which requires those who file original SEIs with the FPPC to do so electronically using the FPPC electronic filing system. (Pre-notice)

March

Levine Act Regulations Update – Update regulations interpreting and applying Government Code section 84308 in response to changes made to the statute by SB 1181 and SB 1243.
(Adoption)

April

Mandatory Electronic Filing of SEIs with the FPPC – Amend various regulations concerning filing of statements of economic interests to implement AB 1170, which requires those who file original SEIs with the FPPC to do so electronically using the FPPC electronic filing system.
(Adoption)

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

- Office of the State Public Defender
- California Housing Finance Agency
- Department of Rehabilitation

Multi-County Agencies

- Sonoma-Marín Area Rail Transit
- Antelope Valley Joint Union High School District
- Big Independent Cities Excess Pool JPA
- California Affiliated Risk Management Authorities
- Colusa Sutter Yolo Regional Child Support Agency
- Statewide Educational Wrap Up Program Joint Powers Authority
- Solano County Water Agency
- Scholarship Prep
- Schools Alliance for Workers' Compensation Excess - II Joint Powers Authority
- Central Valley Flood Protection Board
- Rocketship Education, Inc.

Exemptions

- None

Extensions

- None

I. Probable Cause Proceedings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause exists when the evidence supports a reasonable belief or strong suspicion that a

violation occurred but does not constitute a finding a violation occurred. Respondents are presumed innocent of any violation of the Act until a violation is proven in a subsequent proceeding.

In the Matter of Brown for Bassett School Board Member 2024, and Samuel W. Brown, Candidate, Bassett Unified School District Governing Board Member, Case No. 2024-01046.

On December 4, 2024, probable cause was found, on the papers, that Respondents committed the following violations of the Act:

Count 1: Brown and the Committee failed to timely file the first pre-election campaign statement for the reporting period of January 1, 2024 through September 21, 2024, in connection with his candidacy during the November 5, 2024 General Election, by the deadline of September 26, 2024, in violation of Government Code sections 84200.5 and 84200.8.

Count 1: Brown and the Committee failed to timely file the second pre-election campaign statement for the reporting period of September 22, 2024 through October 19, 2024, in connection with his candidacy during the November 5, 2024 General Election, by the deadline of October 24, 2024, in violation of Government Code sections 84200.5 and 84200.8.

In the Matter of Evan Low, Evan Low for Assembly 2020, and Foundation for California's Technology and Innovation Economy, Case Nos. 20/231 & 23/443. On November 19, 2024, probable cause was found, after a probable cause conference, that Respondents committed the following violations of the Act:

RESPONDENT: LOW

Count 1: Low failed to timely file a behested payment report for a \$5,000 payment made by San Manuel Band of Mission Indians on February 9, 2018 to the Foundation at Low's behest, by the March 11, 2018 due date, in violation of Government Code Section 84224.

Count 2: Low failed to timely file a behested payment report for a \$12,500 payment made by Santa Ynez Band of Chumash Indians on March 2, 2018 to the LGBT Foundation at Low's behest, by the April 1, 2018 due date, in violation of Government Code Section 84224.

Count 3: Low failed to timely file a behested payment report for a \$17,500 payment made by Cox Communications on March 6, 2018 to the Foundation at Low's behest, by the April 5, 2018 due date, in violation of Government Code Section 84224.

Count 4: Low failed to timely file a behested payment report for a \$5,000 payment made by California Dental Association on March 14, 2018 to the LGBT Foundation at

Low's behest, by the April 13, 2018 due date, in violation of Government Code Section 84224.

- Count 5: Low failed to timely file a behested payment report for a \$10,000 payment made by Ghost Management on March 14, 2018 to the LGBT Foundation at Low's behest, by the April 13, 2018 due date, in violation of Government Code Section 84224.
- Count 6: Low failed to timely file a behested payment report for a \$12,500 payment made by Sycuan Band of the Kumeyaay Nation on March 21, 2018 to the LGBT Foundation at Low's behest, by the April 20, 2018 due date, in violation of Government Code Section 84224.
- Count 7: Low failed to timely file a behested payment report for a \$15,000 payment made by CalChamber on April 11, 2018 to the LGBT Foundation at Low's behest, by the May 11, 2018 due date, in violation of Government Code Section 84224.
- Count 8: Low failed to timely file a behested payment report for a \$20,000 payment made by Sutter Health on April 11, 2018 to the LGBT Foundation at Low's behest, by the May 11, 2018 due date, in violation of Government Code Section 84224.
- Count 9: Low failed to timely file a behested payment report for a \$35,000 payment made by Apple on November 2, 2018 to the Foundation at Low's behest, by the December 2, 2018 due date, in violation of Government Code Section 84224.
- Count 10: Low failed to timely file a behested payment report for a \$10,000 payment made by Facebook on April 18, 2019 to the Foundation at Low's behest, by the May 18, 2019 due date, in violation of Government Code Section 84224.
- Count 11: Low failed to timely file a behested payment report for a \$30,000 payment made by AT&T on January 17, 2020 to the Foundation at Low's behest, by the February 16, 2020 due date, in violation of Government Code Section 84224.
- Count 12: Low failed to timely file a behested payment report for a \$10,000 payment made by California Federation of Teachers on February 28, 2020 to Equality California at Low's behest, by the March 29, 2020 due date, in violation of Government Code Section 84224.
- Count 13: Low failed to timely file a behested payment report for a \$25,000 payment made by Gilead Sciences, Inc. on February 28, 2020 to Equality California at Low's behest, by the March 29, 2020 due date, in violation of Government Code Section 84224.
- Count 14: Low failed to timely file a behested payment report for a \$5,000 payment made by LinkedIn on February 28, 2020 to Equality California at Low's behest, by the March 29, 2020 due date, in violation of Government Code Section 84224.

- Count 15: Low failed to timely file a behested payment report for a \$7,500 payment made by West Coast Property Management on March 3, 2020 to Equality California at Low's behest, by the April 2, 2020 due date, in violation of Government Code Section 84224.
- Count 16: Low failed to timely file a behested payment report for a \$7,500 payment made by Perkins Coie on March 17, 2020 to Equality California at Low's behest, by the April 16, 2020 due date, in violation of Government Code Section 84224.

RESPONDENTS: THE COMMITTEE AND LOW

- Count 17: Between December 20, 2019 and February 10, 2020, the Committee and Low accepted non-monetary contributions, totaling \$113,524, from the Foundation that exceeded the applicable contribution limits, in violation of Government Code Section 85301 and Regulation 18545.
- Count 18: The Committee and Low failed to timely file a 24-hour contribution report for a late non-monetary contribution received on December 20, 2019, totaling \$55,000, by the December 23, 2019 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 19: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$55,000 on the semi-annual campaign statement for the reporting period ending December 31, 2019, by the January 31, 2020 due date, in violation of Government Code Section 84211.
- Count 20: The Committee and Low failed to timely file a 24-hour contribution report for a late non-monetary contribution received on January 8, 2020, totaling \$55,000, by the January 10, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 21: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$55,000 on the pre-election campaign statement for the reporting period ending January 18, 2020, by the January 23, 2020 due date, in violation of Government Code Section 84211.
- Count 22: The Committee and Low failed to timely file a 24-hour contribution report for a late non-monetary contribution received on February 3, 2020, totaling \$2,249.50, by the February 5, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 23: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$2,249.50 on the pre-election campaign statement for the reporting period ending February 15, 2020, by the February 20, 2020 due date, in

violation of Government Code Section 84211.

- Count 24: The Committee and Low failed to timely file a 24-hour contribution report for cumulative late non-monetary contributions received between February 4, 2020 and February 7, 2020, totaling \$1,180.50, by the February 10, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 25: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$724.50 on the pre-election campaign statement for the reporting period ending February 15, 2020, by the February 20, 2020 due date, in violation of Government Code Section 84211.
- Count 26: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$94 on the pre-election campaign statement for the reporting period ending February 15, 2020, by the February 20, 2020 due date, in violation of Government Code Section 84211.
- Count 27: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$362 on the pre-election campaign statement for the reporting period ending February 15, 2020, by the February 20, 2020 due date, in violation of Government Code Section 84211.
- Count 28: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$94.50 on the pre-election campaign statement for the reporting period ending February 15, 2020, by the February 20, 2020 due date, in violation of Government Code Section 84211.
- Count 29: The Committee and Low failed to provide notice to a potential major donor committee after receiving a non-monetary contribution on December 20, 2019, totaling \$55,000, by the December 27, 2019 due date, in violation of Government Code Section 84105 and Regulation 18427.1.
- Count 30: The Committee and Low failed to provide notice to a potential major donor committee after receiving a non-monetary contribution on January 8, 2020, totaling \$55,000, by the January 15, 2020 due date, in violation of Government Code Section 84105 and Regulation 18427.1.
- Count 31: Between December 20, 2019 and February 10, 2020, the Foundation made a non-monetary contribution, totaling \$113,524, to the Committee and Low that exceeded the applicable contribution limits, in violation of Government Code Section 85301 and Regulation 18545.
- Count 32: The Foundation failed to timely file a 24-hour contribution report for a late non-monetary contribution made on December 20, 2019, totaling \$55,000, by the December 23, 2019 due date, in violation of Government Code Section 84203.

- Count 33: The Foundation failed to timely file a major donor campaign statement for the reporting period ending December 31, 2019, by the January 31, 2020 due date, in violation of Government Code Section 84200.
- Count 34: The Foundation failed to timely file a 24-hour contribution report for a late non-monetary contribution made on January 8, 2020, totaling \$55,000, by the January 9, 2020 due date, in violation of Government Code Section 84203.
- Count 35: The Foundation failed to timely file a 24-hour contribution report for a late non-monetary contribution made on February 3, 2020, totaling \$2,249.50, by the February 4, 2020 due date, in violation of Government Code Section 84203.
- Count 36: The Foundation failed to timely file a 24-hour contribution report for cumulative late non-monetary contributions made between February 4, 2020 and February 7, 2020, totaling \$1,180.50, by the February 10, 2020 due date, in violation of Government Code Section 84203.
- Count 37: The Foundation failed to timely file a major donor campaign statement for the reporting period ending June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Section 84200.
- Counts 38-44: After making seven non-monetary contributions between December 20, 2019 and February 10, 2020, totaling \$113,524, the Foundation failed to notify the recipient, within 24 hours, of the value of each non-monetary contribution made, in violation of Government Code Section 84203.3, subdivision (a).

The Enforcement Division alleges the following violations as an alternative, as discussed above:

RESPONDENTS: THE COMMITTEE AND LOW

- Count 45: The Committee and Low failed to timely disclose the receipt of a non-monetary contribution totaling \$113,524 on the pre-election campaign statement for the reporting period ending February 15, 2020, by the February 20, 2020 due date, in violation of Government Code Section 84211.
- Count 46: The Committee and Low failed to timely file a 24-hour contribution report for a late non-monetary contribution received on February 7, 2020, totaling \$113,524, by the February 10, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- Count 47: The Committee and Low failed to provide notice to a potential major donor committee after receiving a non-monetary contribution on February 7, 2020, totaling \$113,524, by the February 14, 2020 due date, in violation of Government Code Section 84105 and Regulation 18427.1.
- Count 48: The Foundation failed to timely file a 24-hour contribution report for a late non-

monetary contribution made on February 7, 2020, totaling \$113,524, by the February 10, 2020 due date, in violation of Government Code Section 84203.

Count 49: The Foundation failed to timely file a major donor campaign statement for the reporting period ending June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Section 84200.

Count 50: After making a non-monetary contribution, totaling \$113,524, on February 7, 2020, the Foundation failed to notify the recipient, within 24 hours, of the value of the non-monetary contribution made, in violation of Government Code Section 84203.3, subdivision (a).

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

Executive Division

Eva Hartman, Executive Fellow
Davina Vo, Commission Assistant
Shery Yang, Communications Director

Enforcement Division

Cole Smith, Political Reform Consultant

B. Hiring Process

Enforcement Division

Attorney

Legal Division

Staff Services Manager I

Audits & Assistance Division

Senior Management Auditor

C. Statement of Economic Interest (SEI, Form 700)

2023 Annual Statement Filing Status

As of January 2, 2025, 15,909 2023 annual statements, representing approximately 99% of the total, have been received and processed. There are 168 non-filers. SEI staff is currently working on Enforcement referrals for all the non-filers.

Entity	Total	Filed	Not Filed
Cities A - M	3580	3542	38
Cities N - Z	2671	2616	55
Counties	831	818	13
Keenan	17	17	0
Legislative Staffers	1616	1616	0

Multi-County Agencies	4412	4373	39
State Agencies	2782	2759	23
Total	15909	15741	168
		99%	1%

Among 15,909 statements, 53% were filed through FPPC's E-filing system, 31% were filed through the Local E-Filing system, and 16% were filed on paper.

Entity	Filed	FPPC E-Filing System	Local E-Filing System	Paper Filing
Cities A - M	3542	1173	1526	843
Cities N - Z	2616	640	1517	459
Counties	818	86	535	197
Keenan	17	17	0	0
Legislative Staffers	1616	1584	0	32
Multi-County Agencies	4373	3229	389	755
State Agencies	2759	1558	927	274
Total	15741	8287	4894	2560
		53%	31%	16%

2024 Annual Statement Filing Status

Notifications were sent on January 2, 2025, reminding FPPC filers that the 2024 Annual Statement of Economic Interests (Form 700) is due by **April 1, 2025**, for most filers and by **March 3, 2025**, for elected State Officers, Judges, Court Commissioners, and members of State Boards and Commissions specified in Government Code Section 87200.

AB 1170 Implementation

Effective January 1, 2025, public officials whose filing officer is the Commission are required to submit their Statement of Economic Interests (Form 700) through the FPPC's Electronic Filing System.

On December 31, 2024, a welcome email containing login credentials was sent to all filers without existing accounts.

SEI Unit December 2024 Summary

- Referred 137 cases to the Enforcement
- Issued 49 fine letters
- Issued 361 Non-filer letters and 19 Amendment letters
- Processed 614 Form 462
- Responded 9104 emails from form700@fppc.ca.gov

- Re-certified 30 existing local e-filing systems and approved 17 new local e-filing systems

D. Collection/Revenue

July 2024 – December 2024 Report of Collection				
Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$30,000	-	-	\$ 30,000
SEI Fine	\$ 4,775	\$ 14,066	\$ 1,051	\$ 19,892
PREP	\$ 452	\$ 7,202	-	\$ 7,654
Enforcement Collection	\$ 9,703	\$ -1,197	\$ 4,324	\$ 12,830
Enforcement Stipulations	\$ 198,610	\$ 104,638	-	\$ 303,248
Reimbursement	\$ 56,241	-	-	\$ 56,241
Total	\$ 299,780	\$ 124,709	\$5,375	\$ 429,864

E. Information Technology

The FPPC IT unit is continuing work on the website replacement project, which is expected to be completed by July 2025. During the discovery phase, the project team identified 37 primary requirements to address key issues within the project's overall scope. The next step is the Design Phase, which involves developing the information architecture, content inventory, visual design, and technical design. The Design Phase is scheduled for completion by January 2025.