

News from the FPPC



California Fair Political Practices Commission
1102 Q Street, Suite 3050, Sacramento, CA 95811
www.fppc.ca.gov

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Contact: Shery Yang at (916) 322-7761

Additional information on each of the enforcement cases listed below can be found in the January agenda on the FPPC website at www.fppc.ca.gov. FPPC agendas are distributed and posted on the agency website at least 10 days prior to each monthly meeting.

The web version of the agenda includes links to the stipulations agreed to between the FPPC Enforcement Division and the individuals and organizations subject to the fines, or the default decisions proposed to the Commission. Exhibits in support of the stipulations and proposed default decisions are also available on the website. If you need further assistance, please contact the FPPC communications office at (916) 322-7761 or press@fppc.ca.gov.

I. The following are enforcement decisions approved by the Fair Political Practices Commission at its regular monthly meeting held on Thursday, February 13, 2025. Decisions are listed by category and include a brief summary of each case and the total amount of any administrative fine in each case.

Laundered Campaign Contributions

In the Matter of Ryan Ogulnick; AC 2525 Main, LLC; RHW Holdings, LLC; Beverly Grossman Palmer; and the PAC known as “Californians for Ethical Patient Care, Yes on Tinajero for Mayor and Sarmiento and Reyna for City Council; No on Bacerra for City Council, Santa Ana 2018, Sponsored by 19th Green OC, LLC,”; FPPC No. 18/1194. Staff: Neal Bucknell, Senior Commission Counsel and George Aradi, Special Investigator. Palmer and the PAC are represented by Amber Maltbie of Nossaman LLP. Ogulnick and the LLC respondents are represented by Gary Winuk of Kaufman Legal Group. Ryan Ogulnick is an Orange County developer and part-owner of the LLC respondents, which are both development companies. Beverly Grossman Palmer is a campaign attorney and partner with the law firm of Strumwasser & Woocher, LLP. Palmer served as the PAC’s treasurer. In this matter, at the request/direction of Ogulnick, the LLC respondents made three contributions to the PAC (totaling \$320,000) in the name of another company—in violation of Government Code Section 84301 (3 counts). Also, Ogulnick, the LLC respondents, and the PAC caused misleading and inaccurate reporting on a 24-Hour Report regarding the true sources of contributions to the PAC (totaling \$170,000), in violation of Government Code Section 84203 (1 count). With respect to a semi-annual statement that was filed for the period ending December 31, 2018, Ogulnick, Palmer, the PAC, and both LLC respondents failed to comply with various campaign reporting requirements, in violation of Government Code Sections 84211, subdivisions (f), (k); and 84303

(1 count). Palmer and the PAC failed to file required 24-Hour Reports with respect to the PAC's advertisements—in violation of Government Code Section 84204 (3 counts). Additionally, Ogulnick, the PAC, and the LLC respondents provided misleading and inaccurate top contributor disclosures for PAC advertisements (during the last week leading up to the election), in violation of Government Code Sections 84503, 84504.1 and 84504.3 (1 count). Fine: \$87,000.

Campaign Late Filer

In the Matter of Mony Nop for Mayor 2020, Mony Nop, and Steve Kau; FPPC No. 20/798.

Staff: Jonathan Rivera, Commission Counsel. Mony Nop was an unsuccessful candidate for Livermore Mayor in the November 2020 General Election. Mony Nop for Mayor 2020 was the candidate's candidate-controlled committee. Steve Kau served as the Committee's treasurer. The Committee, Nop, and Kau failed to timely file a 24-Hour Report in violation of Government Code Section 84203. Chief Discretion was used in this matter to include the count in Tier 2. Fine: \$1,100 (Tier Two).

Statement of Economic Interests Late Filer

In the Matter of Jeffrey Williams; FPPC No. 22/007. Staff: Laura Columbel, Commission Counsel. Jeffrey Williams, a current governing board member for the Weed Rec and Parks District, failed to timely file an Assuming Office and the 2020, 2021, 2022, and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (5 counts). Fine: \$22,500.

In the Matter of Damian Morgan; FPPC No. 22/075. Staff: Laura Columbel, Commission Counsel. Damian Morgan, a board member for Marin City Community Service's District, failed to timely file the 2019, 2020, and 2021 Annual and a Leaving Office Statements of Economic Interests, in violation of Government Code Section 87300 (4 counts). Fine: \$16,000.

In the Matter of Cary Lambeth; FPPC No. 25/092. Staff: James M. Lindsay, Chief of Enforcement, and Taylor Culberson, Staff Services Analyst. Cary Lambeth, Member of the Irvine Sports Committee with the City of Irvine, failed to timely file an Assuming Office and the 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). Fine: \$400 (Tier One)