



NOTICE AND AGENDA Commission Meeting¹

California Fair Political Practices Commission
1102 Q Street, Suite 3050
Sacramento, CA 95811

Thursday, April 10, 2025
10:00 A.M.

Under Government Code section 11123(a), all meetings of a state body are open and public, and all persons are permitted to attend any meeting of a state body, except as otherwise provided in that article. The section further states that the portion of the teleconferenced meeting that is required to be open to the public must be audible to the public at the location specified in the notice of the meeting. Members of the public may listen to the meeting by phone by calling (669) 444-9171; meeting ID 9856036268; or watch the meeting via Webinar at [YouTube](#). To participate in real time, visit <http://mediasite.fppc.ca.gov/> or call (669) 444-9171; meeting ID 9856036268.

To view the new procedure to participate by telephone, visit our [public comment page](#).

Persons who, due to a disability, need assistance in order to participate in this meeting should, prior to the meeting, contact the Commission Assistant at (916) 322-5745 (voice), CommAsst@fppc.ca.gov (e-mail) and ADACoordinator@fppc.ca.gov. TTY/TDD and Speech-to-Speech users may dial 7-1-1 for the California Relay Service to submit comments on an agenda item or to request special accommodations for persons with disabilities.

The Commission may take action on any item listed on this agenda.

Welcome

Adam E. Silver, Chair

Public Comment

- 1. Public Comment for Items not on Agenda.** During this comment period, any person is invited to speak on any topic that is not listed on this agenda. Action may not be taken on any matter raised during this public comment period until the matter is specifically listed on a future agenda. Those who wish to comment on an

¹You can obtain further information about the meeting by contacting the Commission Assistant, 1102 Q Street, Suite 3050, Sacramento, CA, 95811, Tel. (916) 322-5745. Written comments on agenda items should be submitted to the Commission no later than 12:00 p.m. the day before the meeting in order to afford the Commissioners adequate time to fully consider the comments. Email comment letters directly to CommAsst@fppc.ca.gov. To participate in real time, visit <http://mediasite.fppc.ca.gov/>.

The agenda and related documents are posted on the FPPC website at www.fppc.ca.gov. Materials submitted by the public regarding each agenda item will be made available on the website.

item that has been listed on this agenda may comment when that item has been opened for consideration by the Commission and before any action is taken.

Approval of Commission Minutes

2. Approval of March 2025 Commission Meeting Minutes

Consent Calendar 3-4

Items on the consent calendar will be taken up and voted on as a group. A Commissioner may request that an item be removed from consent, in which case it will be discussed separately in the meeting.

Campaign Contribution Limits

- 3. In the Matter of Vicky Santana, Santana for Senate 2018, and David Gould; FPPC No. 20/614.** Staff: Neal Bucknell, Senior Commission Counsel; Lance Hachigian, Supervising Special Investigator; Ann Flaherty, Special Investigator; and Kaitlin Osborn, Special Investigator. Gould is represented by Leilani Beaver of Beaver Legal Corporation. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Santana was an unsuccessful candidate for California State Senate, District 32, in the June 5, 2018 Primary Election. Santana for Senate 2018 was Santana's candidate-controlled committee. Gould was the Committee's treasurer. The Committee, Santana, and Gould accepted over-the-limit campaign contributions (and caused Santana's parents to make over-the-limit campaign contributions) in violation of Government Code Sections 83124 and 85301, and Regulation 18545, subdivision (a)(1) (1 count); reported inaccurate information on a 24-Hour Report, which concealed the true source of campaign funds, in violation of Government Code Section 84203 (1 count); and caused Santana's parents to make a campaign contribution in the name of another, in violation of Government Code Section 84301 (1 count). Total Proposed Penalty \$15,000.

Santana - Stip

Behested Payments

- 4. In the Matter of Evan Low and Evan Low for Assembly 2020; FPPC Nos. 20/231 & 23/443.** Staff: Jenna C. Rinehart, Senior Commission Counsel, and George Aradi, Special Investigator. The Respondents are represented by Amber Maltbie of Nossaman LLP. Low was first elected to State Assembly in 2014 and left office on December 1, 2024. Low was a successful candidate for State Assembly in the March 3, 2020 and the November 3, 2020 elections. Evan Low for Assembly 2020 was Low's candidate-controlled committee. Low failed to timely file behested payment reports, in violation of Government Code Section 84224 (3 counts), and failed to verify campaign statements, in violation of Government Code Section 81004 (7 counts). The Committee and Low failed to timely disclose accrued expenses, in violation of Government Code Section 84211 and Regulation 18421.6 (7 counts), and failed to timely disclose subvendor payments, in violation of Government Code Sections 84303 and 84211 (4 counts). Additionally, the Committee and Low failed to maintain campaign records, in violation of Government Code Section 84104 (1 count), and failed to properly terminate the Committee, in violation of Government Code Section 84214 and Regulation 18404 (1 count). Total Proposed Penalty: \$106,000.

Low – Stip

General Items 5-9

5. **Cal-Access Replacement System (CARS).** Denise Tower, CGI Project Manager, John Heinlein, SOS Assistant Project Director, and Kira Rasmussen, SOS Assistant Division Chief, Political Reform Division. The Secretary of State will provide a CARS general overview and current project status.
6. **Adoption of Proposed Amendments to Regulations Concerning Electronic Filing of SEIs with the FPPC.** Staff: Brian Lau, Assistant General Counsel. Staff presents proposed amendments to Regulations 18115.2, 18313.5, 18313.6, 18724, 18730, 18754, and 18756 as well as the proposed repeal of Regulation 18753. These changes are in response to recent legislation, AB 1170, requiring officials who file a statement of economic interests with the FPPC to do so using the FPPC's electronic filing system. Staff presented this proposal for pre-notice discussion in February and now presents it for adoption.

Staff Memo

Proposed Amendment to Regulation 18115.2

Proposed Amendment to Regulation 18313.5

Proposed Amendment to Regulation 18313.6

Proposed Amendment to Regulation 18724

Proposed Amendment to Regulation 18730

Proposed Amendment to Regulation 18754

Proposed Amendment to Regulation 18756

Proposed Repeal to Regulation 18753

7. **Legislative Update.** Staff: Lindsey Nakano, Senior FPPC Legislative Counsel. The Commission will review and discuss potential sponsored and other legislation. The Commission may provide direction to staff regarding the same.

Legislative Update

8. **Executive Staff Reports.**
Enforcement Division. Angela J. Brereton & Christopher B. Burton, Assistant Chiefs.
Audits and Assistance Division. Shrdha Shah, Chief.
Legal Division. Dave Bainbridge, General Counsel.
Administration and Technology Division. Jue Wang, PhD, Chief.
Executive Director Update. Galena West, Executive Director.

Executive Staff Report

9. **Commissioner Comments and Proposed Future Agenda Items.**
Note: Although any Commissioner may identify a topic of interest, the Commission may not substantially discuss or take action on any matter raised during the meeting that is not included on this agenda, except to decide to place the matter on the agenda of a future meeting. (Government Code Sections 11125 & 11125.7(a).)