



NOTICE AND AGENDA Commission Meeting¹

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

Thursday, February 13, 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.

The Commission should avoid discussing and may not act on any matter raised during this public comment period, except to decide whether to place the matter on the agenda of a future meeting during the last item on the agenda.

Closed Session

- 2. **Closed Session.** Personnel Matter (Gov. Code § 11126(a).)

Approval of Commission Minutes

- 3. **Approval of January 2025 Commission Meeting Minutes**

Consent Calendar 4-6

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.

Laundered Campaign Contributions

- 4. **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). **Total Proposed Penalty \$87,000.**

Ogulnick – Stip

Default Proceedings

Defaults Proceedings Requesting Commission Action

- 5. 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). **Total Proposed Penalty: \$22,500.**

Williams - Default

- 6. 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). **Total Proposed Penalty: \$16,000.**

Morgan - Default

Pre-Notice Defaults

- 7. In the Matter of Carlos Avalos 4 Downey Schools and Carlos Avalos; FPPC No. 20/039.** Staff: Cinthya Bernabé, Commission Counsel. Carlos Avalos was an unsuccessful candidate for the Downey Unified School District Board of Education in the November 3, 2020 General Election. Carlos Avalos 4 Downey Schools was Avalos' candidate-controlled committee. The Committee and Avalos failed to timely file seven semi-annual statements, in violation of Government Code Section 84200 (7 counts). **Total Proposed Penalty: \$21,000 (Tier One).**

General Items 8-17

- 8. Motion to Vacate Default Decision and Order, In the Matter of Sandy Genis for Costa Mesa City Council 2016, et. al.; FPPC No. 18/1359.** Staff: Dave Bainbridge, General Counsel. The Commission will consider a motion filed by Respondent Sandy Genis to vacate the Commission's Default Decision and Order approved at the November 21, 2024 hearing.

Genis – Default

Genis – Motion to Vacate

Genis – Enforcement Response

- 9. Pre-Notice Discussion of Proposed Repeal and Amendments of Regulations concerning Electronic Filing of SEIs with the FPPC.** Staff: Valerie Nuding, Commission 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 contained in AB 1170, and staff proposes the changes to clarify and clean up the Commission's related regulations. The proposed amendments are presented for pre-notice discussion and feedback, with potential adoption to occur at the April Commission meeting.
- 10. Adoption of Proposed Revised Expenditure Codes.** Staff: Chloe Hackert, Manager, Education & External Affairs Unit, Legal Division. Staff presents proposed revisions to expenditure codes for reporting campaign activity by committees that will take effect upon the certification of the Secretary of State's Cal-Access Replacement System (CARS) project. The Commission will consider the proposed expenditure codes for adoption.

Staff Memo

2025 Expenditure Codes
2025 Expenditure Codes Descriptions

11. Discussion of possible FPPC response to wildfires in Los Angeles and Ventura counties, including regulatory and legislative action. Staff: Dave Bainbridge, General Counsel.

12. Form 807 Discretionary Audit Results. Staff: Shrdha Shah, CPA, Chief of Audits and Assistance. Staff will present the results of the Form 807 Discretionary Audit conducted by the Audits and Assistance Division. The audit was performed to verify compliance with reporting requirements provided for Government Code Section 89506(f) and Regulation 18940. Staff will provide an update on the audit purpose, procedures, and related findings and recommendations.

Form 807 Report

13. 2024/2025 Fiscal Year Second Quarter Expenditure Report. Staff: Jue Wang, Chief of Administration.

Second Quarter Expenditure Report

14. 2025/2026 Governor's Budget. Staff: Jue Wang, Chief of Administration.

Staff Memo

15. 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

16. Executive Staff Reports.

Enforcement Division. James M. Lindsay, Chief.

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

FPPC 2024 Heat Map

17. 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).)