



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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EXECUTIVE STAFF REPORTS

December 19, 2019 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: GALENA WEST, CHIEF OF ENFORCEMENT

I. Overview

During the period of November 1, 2019 through November 30, 2019 the Enforcement Division received 43 complaints, opened 16 for investigation, and rejected 17. The Enforcement Division received 137 referrals during this time. The Enforcement Division closed a total of 46 cases including:

- 13 warning letters – campaign violations (5), advertising violations (1), and statement of economic interests violations (7);
- 16 no action closure letters alleging - campaign violations (7), statement of economic interests violations (8), behested payment violations (1);
- 1 default from the August commission meeting; and
- 16 approved stipulations at the November Commission meeting.

The Division had 1,727 cases in various stages of resolution at the time of the November Monthly Report and currently has approximately 1,712 cases in various stages of resolution, including the 27 cases before the Commission as listed in the December 2019 Agenda.

On May 1, 2015, the Division received from the Secretary of State's office 2,460 \$50 Annual Fee referrals for 2013 fees not paid timely. Of those, 4 remain pending. On October 22, 2015, the Division received the \$50 Annual Fee referrals for 2014, which totaled 1,786. Of those, 10 remain pending. We are receiving 2015, 2016, 2017, and 2018 referrals periodically through the new Electronic Complaint System.

II. 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 2018, where consistent with other years, 966 cases were closed with violations found. The penalties collected decreased as the emphasis on providing warnings increased. 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.

	Year	2015	2016	2017	2018
1	Complaints Received	609	1,180	564	1,352
2	Referrals Received	596	350	1,616	1,529
3	Total Complaint and Referrals Received	1,205	1,530	2,180	2,881
4	Cases opened	2,273 ¹	1,315	1,480	1,561
5	Cases closed	1,253	1,803	1,477	1,243
6	Cases with resolutions approved by the Commission ²	333	311	340	235
	a Streamline cases approved by Commission	258	234	262	173
	b Mainline cases approved by Commission	69	70	66	56
	c Default cases approved by Commission	6	7	12	6
7	Total fines imposed by the Commission	\$703,821	\$894,257	\$1,126,933	\$499,606
8	Warning letters issued	442	489	505	554
9	Administrative terminations	116	668	297	177
10	Cases closed with violations found ³	891	1,468	1,142	966
11	Advisory letters issued	19	14	17	20
12	No action closure letters	343	321	318	252

¹ In 2015, the Enforcement Division received information regarding 2,460 \$50 Annual Fee non-payers in May and another 1,786 in October of that year. None of these came through the typical “referral” process and had to be evaluated for: whether the committee had been terminated locally or with SOS, whether the committee never qualified, whether the fees were paid prior to the referral, and whether records existed to evaluate the committee, before the information could be opened into a case. Therefore, these do not appear in the Referral line since they did not follow that process.

² Total for lines 6a, 6b, and 6c.

³ Total for lines 6, 8, and 9.

III. 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 her discretion per Regulation 18360.2.

Campaign Late Filer

[In the Matter of Todd Miller for Madera County Auditor Controller 2014 and Todd](#)

[Miller; FPPC No. 18/528](#). Staff: Galena West, Chief of Enforcement and Dominika Wojenska, Associate Governmental Program Analyst. Todd Miller was a successful candidate for Madera County Auditor-Controller in the June 5, 2018 Primary Election. Todd Miller for Madera County Auditor Controller 2014 is his candidate-controlled committee. The Committee and Miller failed to timely file four semiannual campaign statements, in violation of Government Code Section 84200 (4 counts), and two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts). The Committee and Miller also failed to amend their statement of organization, in violation of Government Code Section 84103 (1 count). **Total Proposed Penalty: \$1,420.**

[In the Matter of Holland White for Pittsburg City Council 2018, Holland White, and Lynn](#)

[Enea; FPPC No. 19/1247](#). Staff: Galena West, Chief of Enforcement and Tara Stock, Intake Manager. Holland White was a successful candidate for Pittsburg City Council in the November 6, 2018 General Election. Holland White for Pittsburg City Council 2018 was his candidate-controlled committee. Lynn Enea is the Committee's treasurer. The Committee, White, and Enea failed to timely file five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts). **Total Proposed Penalty: \$1,289.**

[In the Matter of Casas for Trustee 2016 and Laura Casas; FPPC No. 18/1118](#)

Staff: Galena West, Chief of Enforcement and Tara Stock, Intake Manager. Laura Casas was a successful candidate for the Foothill-De Anza Community College District Board in the November 8, 2016 General Election. Casas for Trustee 2016 was her candidate-controlled committee. The Committee and Casas failed to timely file two semiannual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Proposed Penalty: \$400.**

[In the Matter of No Perello Recall Oxnard Election Committee and Bert Perello; FPPC No. 19/1316](#)

Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Bert Perello is an Oxnard City Councilmember who was subject to a recall election on May 1, 2018. No Perello Recall Oxnard Election Committee was his candidate-controlled committee. The Committee and Perello failed to timely file one semiannual campaign statement, in violation of Government Code Section 84200 (1 count). **Total Proposed Penalty: \$251.**

[In the Matter of Sofia Rubalcava for Ventura City Council 2018, Sofia Rubalcava, and](#)

[Gabriela Rodriguez; FPPC No. 18/1342](#). Staff: Galena West, Chief of Enforcement and Teri Rindahl, Political Reform Consultant. Sofia Rubalcava was a successful candidate for Ventura City Council in the November 6, 2018 General Election. Sofia Rubalcava for Ventura City Council 2018 was her candidate-controlled committee. Gabriela Rodriguez was the Committee's

treasurer. The Committee, Rubalcava, and Rodriguez failed to timely file one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$242.**

In the Matter of Bob Brunton for State Assembly 2018 and Bob Brunton; FPPC No. 18/1490. Staff: Galena West, Chief of Enforcement and Tara Stock, Intake Manager. Bob Brunton was a successful candidate for California State Assembly in the June 5, 2018 Primary Election, and an unsuccessful candidate for California State Assembly in the November 6, 2018 General Election. Bob Brunton for State Assembly 2018 was his candidate-controlled committee. The Committee and Brunton failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Daniel K. Denier; FPPC No. 19/1042. Staff: Galena West, Chief of Enforcement and Tara Stock, Intake Manager. Daniel Denier is a Board Member for the Galt Union High School District. Denier failed to timely file an Officeholder and Candidate Campaign Statement Short Form for 2019, in violation of Government Code Section 84206 (1 count). **Total Proposed Penalty: \$200.**

Campaign Late Filer and Late Reporter

In the Matter of Dodd for College Board 2018, Jeff Dodd, and Sandra J. Sims; FPPC No. 18/1290. Staff: Galena West, Chief of Enforcement and Tara Stock, Intake Manager. Jeff Dodd was a successful candidate for the College Board of Napa Valley in the November 6, 2018 General Election. Dodd for College Board 2018 is his candidate-controlled committee. Sandra J. Sims is the Committee's treasurer. The Committee, Dodd, and Sims failed to timely disclose subvendor payments on two pre-election campaign statements, in violation of Government Code Section 84211 (2 counts), and failed to timely file a 24-Hour Report, in violation of Government Code Section 84203 (1 count). **Total Proposed Penalty: \$649.**

Statement of Economic Interests Late Filer

In the Matter of Paul Stevens; FPPC No. 19/214. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Paul Stevens, as a Senior Transportation Engineer of District 7 Los Angeles, for the Department of Transportation, failed to timely file a 2017 Annual Statement of Economic interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$400.**

In the Matter of Darryl Levine; FPPC No. 17/1162. Staff: Jenna Rinehart, Commission Counsel. Darryl Levine, a Board Member of Registered Nursing for the Department of Consumer Affairs, failed to timely file an Assuming Office and a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Proposed Penalty: \$400.**

In the Matter of Greg Eckert; FPPC No. 17/1465. Staff: Jenna Rinehart, Commission Counsel. Greg Eckert, a Planning and Economic Development Commissioner for the City of Mammoth Lakes, failed to timely file an Assuming Office and a 2018 Annual Statement of

Economic Interests, in violation of Government Code Sections 87202 and 87203 (2 counts).
Total Proposed Penalty: \$400.

In the Matter of Gagandip Bath; FPPC No. 18/515. Staff: Galena West, Chief of Enforcement and Cheng Saetern, Staff Services Analyst. Gagandip Bath, a Director of the Raisin City Water District, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$400.**

In the Matter of Michelle Zemlicka-Stadler; FPPC No. 17/1251. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Michelle Zemlicka-Stadler, as a Member of the Placer County Child Care Advisory Council, failed to timely file a 2016 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count).
Total Proposed Penalty: \$200.

In the Matter of Michelle Rivas; FPPC No. 18/742. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Michelle Rivas, as a Governing Board Member of Twin Rivers Unified School District, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of William Battocchio; FPPC No. 18/448. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. William Battocchio, as a Grand Juror of Ventura County Grand Jury, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Rachele Arizmendi; FPPC No. 19/1116. Staff: Galena West, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Rachele Arizmendi, City Councilmember for the City of Sierra Madre, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Marco Ruano; FPPC No. 19/211. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Marco Ruano, as a Supervising Transportation Engineer of District 7 Los Angeles, for the Department of Transportation, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Andrew Redfield; FPPC No. 19/1188. Staff: Galena West, Chief of Enforcement and Shaina Elkin, Staff Services Analyst. Andrew Redfield, Animal Control Officer II for Los Angeles Animal Services, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Mia Geil; FPPC No. 19/296. Staff: Galena West, Chief of Enforcement and Cheng Saetern, Staff Services Analyst. Mia Geil, Planning Commissioner for the City of Sanger,

failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Reginald Smith; FPPC No. 19/573. Staff: Galena West, Chief of Enforcement and Cheng Saetern, Staff Services Analyst. Reginald Smith, a Licensing Program Analyst with the Department of Social Services, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Daniel Suenram; FPPC No. 19/020. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Daniel Suenram, as a Planning Commissioner for the County of Lake, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Proposed Penalty: \$200.**

Statement of Economic Interests Late Reporter

In the Matter of Anthony Beall; FPPC No. 19/1418. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. The respondent was represented by Chad D. Morgan of Chad D. Morgan Attorney at Law. Anthony Beall, as a City Councilmember for Rancho Santa Margarita, failed to timely report spousal income on his 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). **Total Proposed Penalty: \$100.**

In the Matter of Jennifer Beall; FPPC No. 19/1419. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. The respondent was represented by Chad D. Morgan of Chad D. Morgan Attorney at Law. Jennifer Beall, as a District Coordinator for Assembly member Bill Brough, failed to timely report income from campaign consulting on her 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). **Total Proposed Penalty: \$100.**

In the Matter of Deborah Jyl Lutes; FPPC No. 16/20091. Staff: Megan A. Van Arsdale, Commission Counsel and George Aradi, Special Investigator. Deborah Jyl Lutes, as a City Councilmember for the City of Salinas, failed to timely disclose a gift on her 2014 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). **Total Proposed Penalty: \$100.**

II. LEGAL DIVISION

STAFF: DAVID BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

California State Association of Counties and California School Boards Association v. FPPC
Los Angeles County Superior Court, Central District, Case No. BS174653

On September 11, 2018, petitioners served a first amended petition for writ of mandate and complaint for declaratory relief. Petitioners allege that Regulations 18420.1 and 18901.1 are invalid as a matter of law, that the Commission has exceeded its jurisdiction in adopting these Regulations, and that the Regulations are unenforceable.

The Attorney General's Office is representing the Commission and timely filed an answer to the petition/complaint. On March 4, 2019, the Commission filed a Motion for Judgment on the Pleadings.

On March 29, 2019, the Commission's Motion for Judgment on the Pleadings was granted with leave to amend. The court vacated all hearing dates and set a new trial setting conference. Plaintiffs timely filed a Second Amended Complaint (SAC) on June 27, 2019.

The Commission filed a demurrer and the hearing occurred on November 22, 2019. In its ruling, the court: (1) sustained the demurrer to the first cause of action without leave to amend; (2) sustained the demurrer with leave to amend on plaintiff CSBA's standing on all cause of action and plaintiff CSAC's standing on all causes of actions challenging Regulation 18901.1; and (3) overruled the remaining grounds for demurrer. Plaintiffs must file a third amended complaint on or before January 8, 2020.

Howard Jarvis Taxpayers Association, et al. v. Edmund Brown, et al.
Court of Appeal, Third Appellate District, Case No. C086334

On December 12, 2016, the Howard Jarvis Taxpayers Association and retired State Senator and Judge Quentin L. Kopp filed a lawsuit against Governor Brown and the Commission to invalidate a new law that would allow public funds to be used for political campaigning. In September of 2016, the Governor signed Senate Bill 1107 which authorizes the use of public funds to finance campaigns if a jurisdiction adopts a law or ordinance creating a public financing program. Plaintiffs allege the new law improperly eliminates the prohibition against public financing of campaigns, implemented pursuant to Proposition 73 in 1988, because it was done without voter approval. In addition, plaintiffs allege that the new law violates the Political Reform Act because it does not "further the purposes of the Act," an express requirement in the Act for legislative amendment.

The Attorney General's Office is representing both Governor Brown and the Commission in this litigation. A hearing was held in Superior Court on August 4, 2017. After taking the matter under submission, the Court issued a Ruling, dated August 23, 2017, "entering a judgment declaring that the amendments made to Government Code section 85300 by Senate Bill No. 1107 are void and have no legal effect; and an injunction restraining Respondents from enforcing the unconstitutional amendments made by Senate Bill No. 1107."

In closed session at its meeting on September 21, 2017, the Commission voted to appeal the Superior Court decision. The Notice of Appeal was filed with the Third District Court of Appeal on January 9, 2018. Appellants' Opening Brief was timely filed on September 21, 2018. Respondents' Brief was timely filed on December 10, 2018. Appellants' Reply Brief was timely filed on March 1, 2019.

The appellate court heard oral argument on July 17, 2019. On August 26, 2019, the court affirmed the trial court's order invalidating SB 1107. Appellants did not file a petition for review in the California Supreme Court. Respondents will be seeking an award of attorney's fees and costs. The parties are discussing a potential settlement.

B. Outreach and Training

- Staff Service Manager, Alana Jeydel, guest lectured to a group of students in a California Politics class at American River College on November 6th. 15 students were present.
- Political Reform Consultant, Alexandra Castillo, presented a workshop in Monterey to the California Special Districts Association on November 14 to Form 700 Filing officers. 100 people attended.
- Political Reform Consultant, Deborah Hanephin, presented a workshop to the California State Treasurer's Office on November 20th for Form 700 filers. 25 people attended the workshop.
- Video Tutorials: Commission video tutorials were accessed a total of 340 times in November. Form 700 videos were accessed 202 times, the Candidate/Treasurer video was accessed 86 times, and the filing officer videos were accessed 52 times.

C. Advice

In November 2019, the Legal Division responded to the following requests for advice:

- **Education Program:** The Education Program responded to 408 requests for technical assistance via phone.
- **Requests for Advice:** The Email Advice and Conflict of Interest Code Program and Legal Division attorneys collectively responded to more than 531 e-mail and telephone requests for advice, 17 of which were not responded to within 24 hours.

- **Advice Letters:** The Legal Division received six advice letter requests under the Political Reform Act and completed 17 letters.
- **Section 1090 Letters:** The Legal Division received four advice letter requests concerning Section 1090 and completed six letters. This year to date, we have received 72 advice requests regarding Section 1090.

D. Miscellaneous Decisions

None to report.

E. Potential Upcoming Regulations

January 17th, 2020

- **Sponsored Committee Rules (Regulation 18419):** Amend existing regulation including (1) time periods for analyzing whether a committee qualified as sponsored, (2) naming requirements, and (3) harmonizing with Section 84222. (Adoption.)

February 20th, 2020

- **Public Participation in Commission Meetings:** Provide rules and guidelines for participation by the public in Commission meetings. (Prenotice discussion.)

March 19th, 2020

- **Recusal Process (Regulation §18707):** Amend the existing regulation to ensure an official prohibited from participating on an item at a public meeting due to a financial conflict of interest adequately identifies the interest requiring recusal on the record. (Prenotice discussion.)

F. Conflict of Interest Codes

Adoptions and Amendments

State Agency Conflict of Interest Codes

- Department of Finances
- Office of Emergency Services

Multi-County Agency Conflict of Interest Codes

- Modoc County Office of Education
- Santa Cruz County Fire Agencies Insurance Group

Exemptions

None to report.

Extensions

None to report.

G. Probable Cause Hearings

Please note, a finding of probable cause does not constitute a finding that a violation has occurred. The respondents are presumed to be innocent of any violation of the Act unless a violation is proven in a subsequent proceeding.

1. ***In the Matter of Karina Onofre for CA State Assembly 74th District and Karina Onofre, FPPC No. 16/649.*** On December 2, 2019, after a probable cause conference, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: The Committee and Onofre failed to timely file a late contribution report to disclose receipt of a contribution of \$2,000 received on or about September 1, 2016 within 24 hours of receiving the contribution, in violation of Section 84203.

Count 2: The Committee and Onofre failed to timely file a late contribution report to disclose receipt of a contribution of \$1,000 received on or about September 26, 2016 within 24 hours of receiving the contribution, in violation of Section 84203.

Count 3: The Committee and Onofre failed to timely file a pre-election statement for the period of January 1, 2016 to September 24, 2016 and due on September 29, 2016, in violation of Section 84200.5 and 84200.8.

Count 4: The Committee and Onofre failed to timely file a late contribution report to disclose receipt of a contribution of \$2,500 received on or around October 25, 2016 within 24 hours of receiving the contribution, in violation of Section 84203.

Count 5: The Committee and Onofre failed to timely file a pre-election statement for the period ending of September 25, 2016 to October 22, 2016 and due on October 27, 2016, in violation of Section 84200.5 and 84200.8.

Count 6: The Committee and Onofre failed to timely file a semiannual campaign statement for the period of October 23, 2016 to December 31, 2016, in violation of Section 84200.

Count 7: The Committee and Onofre failed to timely file a semiannual campaign statement for the period of January 1, 2017 to June 30, 2017, in violation of Section 84200.

- Count 8: The Committee and Onofre failed to timely file a semiannual campaign statement for the period of July 1, 2017 to December 31, 2017, in violation of Section 84200.
- Count 9: The Committee and Onofre failed to timely file a semiannual campaign statement for the period of January 1, 2018 to the date of termination, May 16, 2018, in violation of Section 84200.
- Count 10: The Committee and Onofre failed to make all expenditures from a designated campaign bank account, in violation of Section 85201.
- Count 11: Onofre purchased a laptop computer with campaign funds and used the laptop for personal purposes which were not related to a political, legislative, or governmental purpose resulting in a substantial personal benefit, in violation of Sections 89512 and 89517.
- Count 12: Onofre purchased a suit with campaign funds, resulting in a substantial personal benefit, in violation of Sections 89512 and 89513, subdivision (d).
- Count 13: Onofre failed to disclose reportable income on her 2016 candidate statement of economic interest in violation of Section 87201 and 87207.

The following matters were decided based solely on the papers. The respondents did not request a probable cause hearing.

2. ***In the Matter of Henry Pritchard, FPPC No. 16/20050.*** On November 8, 2019, probable cause was found to believe Respondent committed the following violations of the Act:

- Count 1: Pritchard failed to timely file a 2015 Annual SEI by April 1, 2016, in violation of Section 87300.
- Count 2: Pritchard failed to timely file a 2017 Annual SEI by April 2, 2018, in violation of Section 87300.

3. ***In the Matter of Long Beach Families Against Measure A and Franklin I. Sims, FPPC No. 16/773.*** On November 18, 2019, probable cause was found to believe Respondents committed the following violations of the Act:

- Count 1: The Committee and Sims failed to timely file a statement of organization with the SOS within 10 days of qualifying as a committee, in violation of Government Code Section 84101.
- Count 2: The Committee and Sims failed to timely file a pre-election campaign statement for the reporting period of January 1, 2016 to May 21, 2016, by the May 26, 2016 due date, in violation of Government Code Sections 84200.5 and 84200.8.

- Count 3: The Committee and Sims failed to timely file a 24-hour contribution report for a \$9,150 contribution received by the May 18, 2016 due date, in violation of Government Code Section 84203, subdivision (a).
- Count 4: The Committee and Sims failed to timely file a semi-annual campaign statement for the reporting period of May 22, 2016 to June 30, 2016, by the August 1, 2016 due date, in violation of Government Code Section 84200.
- Count 5: The Committee and Sims failed to report certain contributor information for approximately 78% of the Committee's total contributions and vendor information for approximately 20% of the Committee's total expenditures for the reporting period of January 1, 2016 to June 1, 2016, in violation of Government Code Section 84211, subdivisions (f), (m), and (k).
- Count 6: In or around May 2016, the Committee and Sims failed to include the proper disclosure on its yard sign advertisements, in violation of Government Code Section 84506, subdivision (a), and Regulations 18402, subdivisions (a) and (c) and 18405.4, subdivision (b)(3)(D).
- Count 7: In 2016, the Committee and Sims failed to include the proper disclosure on its campaign website, in violation of Government Code Section 84506, subdivision (a), and Regulation 18450.4, subdivision (b)(1).
- Count 8: In 2016, the Committee and Sims failed to include the proper disclosure on its magazine advertisement, in violation of Government Code Section 84506, subdivision (a), and Regulation 18450.4, subdivision (b)(3).
4. ***In the Matter of Maryam Hosseinzadeh, FPPC No. 16/19884.*** On November 18, 2019, probable cause was found to believe Respondent committed the following violations of the Act:
- Count 1: Hosseinzadeh failed to timely file her 2015 Annual SEI by April 1, 2016, in violation of Section 87300.
- Count 2: Hosseinzadeh failed to timely file a 2017 Annual/Leaving Office SEI by April 13, 2018, in violation of Section 87300.

III. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: LORESSA HON, CHIEF OF ADMINISTRATION

New Employee Report

Administration and Technology Division
Anh Le, Information Technology Associate