



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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EXECUTIVE STAFF REPORTS

July 16, 2020 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: GALENA WEST, CHIEF OF ENFORCEMENT

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I. Overview

During the period of June 1, 2020 through June 30, 2020 the Enforcement Division received 34 complaints, opened 6 for investigation, and rejected 11. The Enforcement Division received 65 referrals during this time. The Enforcement Division closed a total of 207 cases including:

- 112 warning letters – campaign violations (14), advertisement violations (1), conflict of interests violations (1), lobbying violations (5), and statement of economic interests violations (91);
- 51 no action closure letters alleging – advertisement violations (1), conflict of interests violations (2), campaign violations (10), lobbying violations (5), and statement of economic interests violations (33);
- 40 approved stipulations from the April, May and June Commission meetings;
- 1 administrative judgement from the April Commission meeting; and
- 3 committees were administratively terminated.

The Division had 1,559 cases in various stages of resolution at the time of the June Monthly Report and currently has approximately 1,412 cases in various stages of resolution, including the 28 cases before the Commission as listed in the July Agenda.

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 2019, where Enforcement had a highly efficient and effective year, receiving almost 2,700 complaints and referrals and closing 1,031 cases with violations found. 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	2016	2017	2018	2019
1	Complaints Received	1,180	564	1,352	744
2	Referrals Received	350	1,616	1,529	1,950
3	Total Complaint and Referrals Received	1,530	2,180	2,881	2,694
4	Cases opened	1,315	1,480	1,561	1,820
5	Cases closed ³	1,803	1,477	1,243	1,465
6	Cases with resolutions approved by the Commission ¹	311	340	235	343
	a Streamline cases approved by Commission	234	262	173	263
	b Mainline cases approved by Commission	70	66	56	73
	c Default cases approved by Commission	7	12	6	7
7	Total fines imposed by the Commission	\$894,257	\$1,126,933	\$499,606	\$797,384
8	Warning letters issued	489	505	554	584
9	Administrative terminations	668	297	177	104
10	Cases closed with violations found ²	1,468	1,142	966	1,031
11	Advisory letters issued	14	17	20	9
12	No action closure letters	321	318	252	423

¹ Total for lines 6a, 6b, and 6c.

² Total for lines 6, 8, and 9.

³ Total cases closed includes Commission approved cases from the previous year and a Commission approved administrative judgement. It does not include Commission approved cases not yet closed.

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.

Advertisements

In the Matter of Santa Cruz County Republican Central Committee (State); FPPC No. 20/360. Staff: Galena West, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Santa Cruz County Republican Central Committee (State) is a state general purpose political party committee. The Committee failed to include the proper advertising disclosure on a mailer distributed prior to the March 3, 2020 Primary Election, in violation of Government Code Sections 84504.5 and 84506.5 (2 counts). **Total Proposed Penalty: \$252.**

Campaign Late Filer

In the Matter of Citizens for Cliff Blackman for Superior Court Judge 2020 and Cliff Blackman; FPPC No. 20/348. Staff: Galena West, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. The respondents were represented by Gary Winuk of the Kaufman Legal Group. Cliff Blackman was an unsuccessful candidate for Superior Court Judge in the March 3, 2020 Primary Election. Citizens for Cliff Blackman for Superior Court Judge 2020 was his candidate-controlled committee. The Committee and Blackman failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count) and failed to timely file five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts). **Total Proposed Penalty: \$1,808.**

In the Matter of Sacramento County Young Democrats, Chris Gee Schoon-Tong, and Marie Swenson; FPPC No. 18/750. Staff: Neal Bucknell, Senior Commission Counsel. Sacramento County Young Democrats is a local general purpose committee. Chris Gee Schoon-Tong and Marie Swenson are the Committee's former treasurers. The Committee and Schoon-Tong failed to timely file two semiannual and three pre-election campaign statements, in violation of Government Code Sections 84200 and 84200.5 (5 counts). Additionally, the committee and Swenson failed to timely file one semiannual campaign statement, in violation of Government Code Section 84200 (1 count). **Total Proposed Penalty: \$1,716.**

In the Matter of Ron Briggs for Supervisor 2020 and Ron Briggs; FPPC No. 20/167. Staff: Galena West, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Ron Briggs was an unsuccessful candidate for El Dorado County Supervisor in the March 3, 2020 Primary Election. Ron Briggs for Supervisor 2020 was his candidate-controlled committee. The Committee and Briggs failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts). **Total Proposed Penalty: \$630.**

In the Matter of Re-elect Ron Panziera for Monterey County Board of Education Trustee District 5 2011, Ron Panziera, and Chris Steinbruner; FPPC No. 18/634. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Ron Panziera was a successful candidate for Trustee of Monterey County Board of Education in the November 8, 2011 General Election. Re-elect Ron Panziera for Monterey County Board of Education Trustee District 5 2011 was his candidate-controlled committee. Chris Steinbruner was the Committee's treasurer. The Committee, Panziera, and Steinbruner failed to timely file three semiannual campaign statements, in violation of Government Code Section 84200 (3 counts). **Total Proposed Penalty: \$600.**

In the Matter of Re-elect Erik Ortega as IID Director Division 4 2020 and Erik Ortega; FPPC No. 20/112. Staff: Galena West, Chief of Enforcement and Cheng Saetern, Assistant Political Reform Consultant. Erik Ortega was a successful candidate for Imperial Irrigation District Director in the March 3, 2020 Primary Election. Re-elect Erik Ortega as IID Director Division 4 2020 is his candidate-controlled committee. The Committee and Ortega failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$500.**

In the Matter of Danny Garza for City Council District 5 2018 and Daniel Garza; FPPC No. 18/404. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Daniel Garza was an unsuccessful candidate for San Jose City Council in the June 5, 2018 Primary Election. Danny Garza for City Council District 5 2018 was his candidate-controlled committee. The Committee and Garza failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$302.**

In the Matter of Greg Pitts for Compton Unified Board of Trustees 2020 and Gregory Pitts; FPPC No. 20/140. Staff: Galena West, Chief of Enforcement and Dominika Wojenska, Associate Governmental Program Analyst. Gregory Pitts was an unsuccessful candidate for Compton Unified School District Board in the March 3, 2020 Primary Election. Greg Pitts for Compton Unified Board of Trustees 2020 is his candidate-controlled committee. The Committee and Pitts failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$211.**

In the Matter of Mike Graves for State Assembly 2020, Michael Graves, and Paula Block; FPPC No. 20/141. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Mike Graves was a successful candidate for Member of the State Assembly in the March 3, 2020 Primary Election. Mike Graves for State Assembly 2020 is his candidate-controlled committee. Paula Block is the Committee's treasurer. The Committee, Graves, and Block failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$207.**

In the Matter of Nadia Renner for Board of Supervisors 2020, Nadia Renner, and Yila Renner; FPPC No. 20/109. Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Nadia Renner was an unsuccessful candidate for San Bernardino County Supervisor in the March 3, 2020 Primary Election. Nadia Renner for Board of

Supervisors 2020 was her candidate-controlled committee. Yila Renner was the Committee's treasurer. The Committee, Renner, and Renner 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 Charlene Tabet; FPPC No. 19/1328.](#) Staff: Galena West, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Charlene Tabet, a Board Member with Burbank Unified School District, failed to timely file an Officeholder Campaign Statement Short Form (Form 470) for 2019, in violation of Government Code Section 84206 (1 count). **Total Proposed Penalty: \$200.**

Lobbying

[In the Matter of Clarios; FPPC No. 20/468.](#) Staff: Galena West, Chief of Enforcement and Chloe Hackert, Political Reform Consultant. Clarios, a lobbyist employer, failed to timely file a lobbyist employer quarterly report, in violation of Government Code Section 86117 (1 count). **Total Proposed Penalty: \$275.**

Statement of Economic Interests Late Filer

[In the Matter of Alberto Ochoa; FPPC No. 19/1240.](#) Staff: Galena West, Chief of Enforcement and Amber Burnside, Staff Services Analyst. Albert Ochoa, a Board Member for the e3 Civic High School Board of Directors, 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 Tracy Robinson; FPPC No. 19/1605.](#) Staff: Galena West, Chief of Enforcement and Amber Burnside, Staff Services Analyst. Tracy Robinson, an Alternate Board Member for the Employment Risk Management Authority, 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 Kevin Mitchell; FPPC No. 19/927.](#) Staff: Galena West, Chief of Enforcement and Cheng Saetern, Assistant Political Reform Consultant. Kevin Mitchell, a Board Member of North Lake Tahoe Resort Association, 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 Jeffrey Conklin; FPPC No. 19/926.](#) Staff: Galena West, Chief of Enforcement and Cheng Saetern, Assistant Political Reform Consultant. Jeffrey Conklin, a Board Member of Eureka Union School District Board of Trustees, 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 Timothy Parker; FPPC No. 20/284. Galena West, Chief of Enforcement and Shaina Elkin, Staff Services Analyst. Timothy Parker, a former Board Member for Monte Rio Fire Protection District, 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 Ismael Herrera; FPPC No. 19/1412. Staff: Galena West, Chief of Enforcement and Amber Burnside, Staff Services Analyst. Ismael Herrera, a Member of the Kerman City Council, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). **Total Proposed Penalty: \$200.**

In the Matter of Curtis Hill; FPPC No. 19/1545. Staff: Galena West, Chief of Enforcement and Amber Burnside, Staff Services Analyst. Curtis Hill, a former Board Member for the California Victim Compensation Board, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

Statement of Economic Interests Late Reporter

In the Matter of Scott Schmerelson; FPPC No. 20/215. Staff: Galena West, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. The respondent was represented by Nathan Hardy of Reed & Davidson, LLP. Scott Schmerelson, as a candidate for Board Member of the Los Angeles Unified School District, failed to timely report four sources of income on his Candidate Statement of Economic Interests in connection with the March 3, 2020 Primary Election, in violation of Government Code Section 87300 (4 counts). **Total Proposed Penalty: \$400.**

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 filed a third amended complaint and the Commission has filed an answer. The trial setting conference was held on June 24, 2020, and the trial was set for November 6, 2020, at 9:30 a.m.

B. Outreach and Training

- Political Reform Consultant, Alexandra Castillo, conducted a Form 700 Filers webinar for the California Sheriffs' Association on June 4th. 25 people attended.
- Political Reform Consultants, Adam Ramirez and Katie Trumbly, conducted a Combo Filing Officer (Campaign Filing Officers and SEI Filing Officers) webinar for the City of Livermore on June 10th. 139 people attended.

- Video Tutorials: Commission video tutorials were accessed a total of 594 times in June. Form 700 videos were accessed 273 times, the Candidate/Treasurer video was accessed 221 times, and the filing officer videos were accessed 100 times.

Scheduled Webinars

- July 16th, Political Reform Consultant Adam Ramirez and SSM Alana Jeydel, will conduct two webinars for the City of Buena Park. One webinar will be Candidate/Treasurer and the other will be for Campaign Filing Officers.
- July 29th, Political Reform Consultants, Stephen Hernandez and Katie Trumbly will conduct a Candidate/Treasurer webinar for the City of Livermore.
- August 5th, a Candidate/Treasurer webinar is scheduled for the City of Anaheim
- August 11th, a Candidate/Treasurer webinar is scheduled for the City of Santa Clara.
- August 17th a Candidate/Treasurer webinar is scheduled for the County of San Diego.
- August 19th a Candidate/Treasurer webinar is scheduled for the City of Santa Monica.

C. Advice

The June 2020, Advice Letter Report is available at <http://fppc.ca.gov/content/dam/fppc/NS-Documents/LegalDiv/advice-letter-reports/2020/Advice%20Letter%20Report%20June%202020.pdf>

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

- ***Requests for Advice:*** The Email Advice and Conflict of Interest Code Program and Legal Division attorneys collectively responded to more than 881 e-mail and telephone requests for advice, 43 of which were not responded to within 24 hours.
- ***Advice Letters:*** The Legal Division received 11 advice letter requests under the Political Reform Act and completed 10.
- ***Section 1090 Letters:*** The Legal Division received two advice letter requests concerning Section 1090 and completed four. This year to date, we have received 23 advice requests regarding Section 1090.

D. Miscellaneous Decisions

None to report.

E. Potential Upcoming Regulations

August 20th, 2020

- Enforcement Proceedings (Regulations 18360, 18361.4, 18361.5, 18361.9, 18404.2): Various changes to Enforcement proceedings and practices including updating and clarifying the process for Enforcement complaints, probable cause proceedings, administrative hearings, adoption of proposed decisions by an administrative law judge, and administrative termination. (Adoption.)

September 17, 2020

- Public Generally Exception (Regulation 18703): Amend the existing regulation to provide greater clarity on when the public generally exception will apply to a financial conflict of interest. (Adoption.)
- Statement of Economic Interests (Regulations 18110, 18115, 18735, and 18754): Amend existing regulations regarding the filing of Statements of Economic Interests in light of issues resulting from the significant increase in the use of electronic filing. Also, consider a new regulation governing the filing of a single statement by an official with multiple positions. (Prenotice Discussion.)

October 22, 2020

- Permissible Campaign Expenditures (New regulation): Provide guidance on whether an expenditure of campaign funds has a sufficient political, legislative, or governmental purpose under Article 4 of the Act. Provisions may include specific items previously addressed through the advice or opinion process, and/or generally applicable guidelines. Provisions may also consider a presumption of personal use in instances of cash expenditures of campaign funds without adequate records. (Prenotice Discussion.)

F. Conflict of Interest Codes

Adoptions and Amendments

State Agency Conflict of Interest Codes

- Department of Water Resources

Multi-County Agency Conflict of Interest Codes

- College of the Sequoias
- Regional Water Authority

- Trinity Schools Insurance Group
- Shared Risk Agency Pool

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.

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

1. ***In the Matter of California Commerce Club, Inc., Protect the City of Commerce, Hector Chacon, Paul Fickas, California Alliance Group, LLC., and Rita Copeland, FPPC No. 16/120.*** On April 21, 2020, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: On or about February 5, 2015, Protect the City of Commerce (the PAC) qualified as a recipient committee when it received a contribution in the amount of \$10,000 from the California Commerce Club, Inc. (the casino). At the same time, the PAC became a sponsored committee—and the casino became the PAC’s sponsor. Within 10 days, the PAC’s statement of organization was required to be amended to reflect the casino’s sponsorship of the PAC, the PAC’s qualification as a recipient committee, and the amendment was required in order to change the name of the committee to include the name of its sponsor, the casino. The 10th day fell on a Sunday, and the 11th day was an official state holiday (Presidents’ Day/Washington’s Birthday)—so the last day to file the required amendment was extended to February 17, 2015. However, the required amendment never was filed. In this way, the PAC; Copeland; California Alliance Group, LLC (CAG); Fickas; and Chacon violated Sections 84103, subdivision (a); and 84106, subdivision (a). Copeland’s liability arises from her involvement as the PAC’s paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.

Count 2: On or about February 20, 2015, the PAC filed a Form 496 24-hour report on which it reported making an independent expenditure against John Diaz for Commerce City

Council. This filing was required to reflect that the PAC's new name was something along the lines of: "Protect the City of Commerce, Sponsored by the California Commerce Club, Inc." Instead, the PAC continued to call itself, "Protect the City of Commerce"—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84204, subdivision (b). Copeland's liability arises from her involvement as the PAC's paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.

Count 3: On or about February 20, 2015, the PAC filed a Form 496 24-hour report on which it reported making an independent expenditure against Oralia Rebollo for Commerce City Council. This filing was required to reflect that the PAC's new name was something along the lines of: "Protect the City of Commerce, Sponsored by the California Commerce Club, Inc." Instead, the PAC continued to call itself, "Protect the City of Commerce"—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84204, subdivision (b). Copeland's liability arises from her involvement as the PAC's paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.

Count 4: On or about February 23, 2015, the PAC filed an amended Form 496 24-hour report regarding its previously reported independent expenditure against Diaz. This filing was required to reflect that the PAC's new name was something along the lines of: "Protect the City of Commerce, Sponsored by the California Commerce Club, Inc." Instead, the PAC continued to call itself, "Protect the City of Commerce"—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84204, subdivision (b). Copeland's liability arises from her involvement as the PAC's paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.

Count 5: On or about February 26, 2015, the PAC filed a Form 496 24-hour report on which it reported making another independent expenditure against Diaz. This filing was required to reflect that the PAC's new name was something along the lines of: "Protect the City of Commerce, Sponsored by the California Commerce Club, Inc." Instead, the PAC continued to call itself, "Protect the City of Commerce"—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84204, subdivision (b). Copeland's liability arises from her involvement as the PAC's paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign

- consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.
- Count 6: On or about February 26, 2015, the PAC filed a Form 496 24-hour report on which it reported making another independent expenditure against Rebollo. This filing was required to reflect that the PAC’s new name was something along the lines of: “Protect the City of Commerce, Sponsored by the California Commerce Club, Inc.” Instead, the PAC continued to call itself, “Protect the City of Commerce”—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84204, subdivision (b). Copeland’s liability arises from her involvement as the PAC’s paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.
- Count 7: On or about February 26, 2015, the PAC filed a Form 496 24-hour report on which it reported making an independent expenditure against Sonia Rodriguez for Commerce City Council. This filing was required to reflect that the PAC’s new name was something along the lines of: “Protect the City of Commerce, Sponsored by the California Commerce Club, Inc.” Instead, the PAC continued to call itself, “Protect the City of Commerce”—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84204, subdivision (b). Copeland’s liability arises from her involvement as the PAC’s paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.
- Count 8: In April 2015, the PAC filed a semi-annual campaign statement for the reporting period of January 1 through the date of its termination, April 22, 2015. This filing was required to reflect that the PAC’s new name was something along the lines of: “Protect the City of Commerce, Sponsored by the California Commerce Club, Inc.” Instead, the PAC continued to call itself, “Protect the City of Commerce”—and the PAC made no reference to its sponsor. In this way, the PAC, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); and 84211, subdivision (o). Copeland’s liability arises from her involvement as the PAC’s paid treasurer. The liability of CAG, Fickas, and Chacon arises from their involvement as paid campaign consultants (for aiding and abetting—or for purposely/negligently causing the violation). Also, the liability of Fickas arises from his involvement as a principal officer of the PAC.
- Count 9: This case involves two different direct mailings (the first of which was mailed on or about February 19, 2015, and the second of which was mailed on or about February 25, 2015). Each was sent to thousands of recipients in opposition to certain candidates

for Commerce City Council. The “paid for by” language of these mailers was required to state something along the lines of: “Paid for by Protect the City of Commerce, Sponsored by the California Commerce Club, Inc.” Instead, the mailers simply stated that they were “Paid for by Protect the City of Commerce.” No reference was made to the casino being a sponsor/major funding source. The PAC falsely was held out to be non-sponsored (insofar as its name did not include the name of a sponsor). In this way, the PAC, the casino, Copeland, CAG, Fickas, and Chacon violated Sections 84106, subdivision (a); 84505; and 84506. The liability of the casino, CAG, Fickas, and Chacon arises from acting in concert with the PAC and with each other. Also, their liability arises from aiding and abetting. Additionally, their liability arises from purposely causing other persons to violate the Act. Copeland’s liability arises from her involvement as the PAC’s paid treasurer (for aiding and abetting—or for purposely causing the violation).

2. ***In the Matter of Greg Keebler, Case No. 17/394.*** On June 12, 2020, probable cause was found to believe Respondent committed the following violations of the Act:

Count 1: Respondent failed to timely file his assuming office Statement of Economic Interests (SEI) by the October 20, 2016 due date, in violation of Government Code Section 87300.

Count 2: Respondent failed to timely file his 2016 annual SEI by April 3, 2017 due date, in violation of Government Code Section 87300.

Count 3: Respondent failed to timely file his 2017 annual SEI by the April 2, 2018 due date, in violation of Government Code Section 87300.

Count 4: Respondent failed to timely file his 2018 annual/leaving office SEI by the March 6, 2019 due date, in violation of Government Code Section 87300.

III. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: LORESSA HON, CHIEF OF ADMINISTRATION

New Employee Report

Legal Division

Erika Boyd, Senior Commission Counsel

Legal Division (Advice Unit)

Maria Fernanda Almaraz-Mirazo, Staff Services Analyst

Administration Division

Kristopher (Kris) Shirey, Office Receptionist