



EXECUTIVE STAFF REPORTS

April 20, 2022 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: ANGELA BRERETON, CHIEF

A. Overview

During the period of March 1, 2022 through March 31, 2022 the Enforcement Division received 88 complaints, opened 15 for investigation, and rejected 23. The Enforcement Division received 93 referrals during this time. The Enforcement Division closed a total of 70 cases including:

- 39 warning letters –advertisement violations (2), campaign violations (10), conflict of interest (3), statement of economic interests violations (24);
- 13 no action closure letters alleging –campaign violations (3), and statement of economic interests violations (10);
- 13 approved stipulations from the February and March Commission meetings;
- 1 approved default from the September Commission meeting;
- 1 administrative judgment from the November Commission meeting, and
- 3 cases used as placeholders for system testing.

The Division had 1,516 cases in various stages of resolution at the time of the March Monthly Report and currently has approximately 1,479 cases in various stages of resolution, including the 15 cases before the Commission as listed in the April Agenda.

B. 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 2021, in which the Enforcement Division had a 16% increase in Streamline Penalties compared to 2020 after the Commission updated the Streamline Program regulations with the goal of making the Streamline Program more inclusive. 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	2017	2018	2019	2020	2021
1	Complaints Received	564	1,352	744	1,390	606
2	Referrals Received	1,616	1,529	1,950	1,518	1,751
3	Total Complaint and Referrals Received	2,180	2,881	2,694	2,908	2,357
4	Cases opened	1,480	1,561	1,820	1,155	1,185
5	Cases closed ³	1,477	1,243	1,465	1,526	1,058
6	Cases with penalties ¹	340	235	343	278	269
	a Streamline cases	262	173	263	194	234
	b Mainline cases	66	56	73	77	32
	c Default cases	12	6	7	7	3
7	Total fines imposed	\$1,126,933	\$499,606	\$797,384	\$1,940,107	\$472,248
8	Warning letters issued	505	554	584	777	475
9	Administrative terminations	297	177	104	62	59
10	Cases closed with violations found ²	1,142	966	1,031	1,117	803
1	Advisory letters issued	17	20	9	7	16
12	No action closure letters	318	252	423	402	237

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 Commission approved administrative judgements. It does not include Commission approved cases not yet closed.

C. Prior Year's Workload – 2021 Quarterly Summary

Jan-21		Apr-21	
Year Opened	Existing Case Workload	Year Opened	Existing Case Workload
2015	3	2015	3
2016	38	2016	35
2017	80	2017	70
2018	280	2018	266
2019	428	2019	408
2020	539	2020	441

Jul-21		Nov-21	
Year Opened	Existing Case Workload	Year Opened	Existing Case Workload
2015	2	2015	1
2016	27	2016	15
2017	59	2017	42
2018	249	2018	218
2019	396	2019	327
2020	442	2020	411

D. 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 the Chief's discretion per Regulation 18360.2.

Since the last Monthly Report, the Enforcement Chief has not used discretion to increase the penalties for Tier Two advertising violations resulting in public confusion, under Regulation 18360.3(d)(7)(B)(i)(b), or to increase the penalties for Tier Two violations involving the same candidate, committee, or principal officer who has paid a Tier One penalty to the Commission or received a Warning Letter from the Commission for the same type of violation occurring within the last five years, based on the resulting public harm.

The Enforcement Chief used discretion under Regulation 18360.2 to exclude violations in the following streamline cases presented with this report: In the Matter of Desley Brooks for City Council 2018, and Desley Brooks; FPPC No. 19/1235 [the total penalty exceeds the amount that would be paid in a mainline stipulation]; In the Matter of Black Young Democrats of the East Bay, and Akiba Bradford; FPPC Case No. 19/1350 [lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact and the Committee raised and spent less than \$10,000].

Recordkeeping

[In the Matter of Desley Brooks for City Council 2018, and Desley Brooks; FPPC No. 19/1235.](#) Staff: Bridgette Castillo, Senior Commission Counsel and Roone Petersen, Special Investigator. Desley Brooks was an unsuccessful incumbent candidate for Oakland City Council in the November 6, 2018 General Election. Desley Brooks for City Council 2018 was Brooks' candidate-controlled committee. The Committee and Brooks failed to timely report contributions received on three semi-annual campaign statements and one pre-election campaign statement, in violation of Government Code Section 84211 (4 counts) and failed to properly maintain required records for four campaign reporting periods, in violation of Government Code Section 84104 (4 counts). **Total Penalty: \$3,063 (Tier One & Two).**

Advertisements

[In the Matter of Nancy Young; FPPC No. 22/254.](#) Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Political Reform Consultant. Nancy Young was a successful candidate for Mayor of the City of Tracy in the November 3, 2020 General Election. Young failed to include the proper advertisement disclosure on a mass mailing, in violation of Government Code Section 84305 (1 count). **Total Penalty: \$104 (Tier One).**

Campaign Late Filer

[In the Matter of Roger V. Nunez for City Council 2020, and Roger Nunez; FPPC No. 20/1113.](#) Staff: Marissa Nash, Commission Counsel. Roger Nunez was a successful candidate for City Council in Desert Hot Springs in the November 3, 2020 General Election. Roger V. Nunez for City Council 2020 was Nunez's candidate-controlled committee. The Committee and Nunez failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts); one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count); two 24-hour reports, in violation of Government Code Section 84203 (2 counts) and an amendment to the Statement of Organization to indicate the date the committee qualified as a committee, in violation of Government Code Sections 84101 and 84103 (1 count). **Total Penalty: \$1,802 (Tier One & Two).**

[In the Matter of Saleh 4 CUHSD Trustee 2020, and Basil Saleh; FPPC No. 21/129.](#) Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Basil Saleh was an unsuccessful candidate for the Campbell Union High School District Board of Trustees in the November 3, 2020 General Election. Saleh 4 CUHSD Trustee 2020 was Saleh's candidate-controlled committee. The Committee and Saleh failed to timely file a pre-election statement, in violation of Government Code Section 84200.5 (1 count); a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count) and two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts). **Total Penalty: \$1,394 (Tier One & Two).**

[In the Matter of the Committee to Re-elect Aurelio Salazar, Jr. to the Hartnell College Board of Trustees, Area 2, 2020, Aurelio Salazar, Jr., and Carina Chavez-Salazar; FPPC No. 20/995.](#) Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Political

Reform Consultant. Aurelio Salazar, Jr. was a successful candidate for the Hartnell Community College District Board of Trustees in the November 3, 2020 General Election. The Committee to Re-elect Aurelio Salazar, Jr. to the Hartnell College Board of Trustees, Area 2, 2020 was their candidate-controlled committee. Carina Chavez-Salazar was the Committee's treasurer. The Committee, Salazar, Jr., and Chavez-Salazar failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts) and one 24-hour report, in violation of Government Code Section 84203 (1 count). **Total Penalty: \$1,310 (Tier One).**

In the Matter of Sandy Brown for City Council 2016, Sandy Brown for City Council 2020, Sandy Brown, Jill Ayers, and Madeline Clyde; FPPC No. 17/362. Staff: Marissa Nash, Commission Counsel. Sandy Brown was a successful candidate for Santa Cruz City Council in November 8, 2016 General Election and November 3, 2020 General Election. Jill Ayers served as the 2016 Committee treasurer. Madeline Clyde served as the 2020 Committee treasurer. The 2016 Committee, Brown and Ayers failed to timely file three semi-annual campaign statements, in violation of Government Code Section 84200 (3 counts). The 2020 Committee, Brown and Clyde failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Penalty: \$1,143 (Tier One).**

In the Matter of Black Young Democrats of the East Bay, and Akiba Bradford; FPPC Case No. 19/1350. Staff: Jenna C. Rinehart, Commission Counsel and Jay Gehres, Special Investigator. Black Young Democrats of the East Bay is a county general purpose committee. Akiba Bradford serves as the Committee's treasurer. The Committee failed to timely file five semi-annual campaign statements, in violation of Government Code Section 84200 (5 counts). **Total Penalty: \$1,066 (Tier One).**

In the Matter of Committee to Elect Mark Robak to Otay Water 2020, and Mark Robak; FPPC No. 21/1067. Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Mark Robak was a successful candidate for the Otay Water District Board in the November 3, 2020 General Election. Committee to Elect Mark Robak to Otay Water 2020 was Robak's candidate-controlled committee. The Committee and Robak failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Penalty: \$422 (Tier One).**

In the Matter of California College Republicans, and James Barr; FPPC No. 20/793. Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. California College Republicans was a general purpose committee. James Barr was the committee's Treasurer. The Committee and Barr failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). **Total Penalty: \$496 (Tier One).**

In the Matter of Andrew Cruz CVUSD School Board 2020, and Andrew Cruz; FPPC No. 21/358. Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Andrew Cruz was a successful candidate for the Chino Valley Unified School District Board in the November 3, 2020 General Election. Andrew Cruz CVUSD School Board 2020 was Cruz's candidate-controlled committee. The Committee and Cruz failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$278 (Tier One).**

Statement of Economic Interests Late Filer

In the Matter of Sarah Sanders; FPPC No. 22/204. Staff: Angela Brereton, Chief of Enforcement and Laura Mandler, Political Reform Consultant. Sarah Sanders, an Emergency Services Coordinator for 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 Penalty: \$200 (Tier One).**

Statement of Economic Interests Late Reporter

In the Matter of Anthony “Tony” Rackauckas; FPPC Case No. 18/1188. Staff: Jenna Rinehart, Commission Counsel and George Aradi, Special Investigator. Charles Bell of Bell, McAndrews & Hiltachk, LLP represented Rackauckas in this matter. Anthony “Tony” Rackauckas, former Orange County District Attorney, failed to timely disclose a source of income (gift of air travel) on the 2016 and 2017 Annual Statements of Economic Interests, in violation of Government Code Section 87207 (2 counts). **Total Penalty: \$200**

II. AUDITS AND ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF

A. Overview

The audit reports prepared by the FPPC summarize findings with respect to the filer's conformity with the disclosure and recordkeeping requirements of the Political Reform Act. Copies of audit reports are sent to the auditees and those included in the audit report (such as the prior treasurer, current treasurer and/or their representatives). These reports are public documents.

B. Current Period Updates

During the period of February 1, 2022 through February 28, 2022, the Audits and Assistance Division adopted 2 audit reports, both with findings. The reports have been referred to the Enforcement Division pursuant to our standard practice. Currently, the team has 37 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

C. Information on Public Draws

The Audits and Assistance Division will provide an overview of the public draws held at FPPC to select a portion of the mandatory audits.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

Mat Wahlstrom v. FPPC, Steven J. Kaufman and Kaufman Legal Group, APC
San Diego County Superior Court, Central Division
Case No. 37-2020-00030654-CU-WMCTL

Petitioner filed a petition for writ of mandate on August 31, 2020. The petition seeks to set aside a streamline stipulation, decision and order against Todd Gloria adopted by the Commission in November 2019. The Attorney General is representing the Commission. The Commission timely filed an answer to the complaint. Petitioner filed an amended petition on May 12, 2021. The Commission filed a demurrer to the amended petition, the parties submitted briefs and at a hearing on December 13, 2021.

On March 17, 2022, the court issued a tentative ruling sustaining the Commission's demurrer without leave to amend the petition. Petitioner did not request a hearing to contest the tentative ruling, thus the tentative will become the court's final ruling. A proposed judgment will be signed by all parties and filed with the court for its approval and issuance.

B. Outreach and Training

Webinars

- March 2, the FPPC presented a Candidate/Treasurer webinar requested by the City of Pasadena. Education Program Manager, Chloe Hackert, and Political Reform Consultant, Katie Trumbly, presented. 16 people attended.
- March 3, the FPPC hosted a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants, Alex Castillo, and Stephen Hernandez, presented. 3 people attended.
- March 9, the FPPC presented a Statement of Economic Interests Filing Officer webinar requested by Sonoma County Counsel's Office. Political Reform Consultants, Alex Castillo, and Stephen Hernandez, presented. 58 people attended.
- March 10, the FPPC hosted a Candidate/Treasurer webinar. Education Program Manager, Chloe Hackert, and Political Reform Consultant, Katie Trumbly, presented. 9 people attended.
- March 13, the FPPC presented a Candidate/Treasurer webinar requested by the San Bernardino County Democratic Party. Education Program Manager, Chloe Hackert, presented. 10 people attended.
- March 15, the FPPC hosted a Statement of Economic Interests Filers webinar. Political Reform Consultants, Alex Castillo, and Adam Ramirez, presented. 10 people attended.

- March 22, the FPPC hosted a Campaign Filing Officer webinar. Political Reform Consultants, Alex Castillo, and Katie Trumbly, presented. 19 people attended.
- March 23, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants, Alex Castillo and Adam Ramirez, presented. 11 people attended.
- March 30, the FPPC presented a Candidate/Treasurer webinar requested by City of Oakland Public Ethics Commission. Education Program Manager, Chloe Hackert, and Political Reform Consultant, Stephen Hernandez presented. 14 people attended.

Scheduled Webinars

- April 14, the FPPC is hosting an AB 571 webinar.
- April 19, the FPPC is hosting a Campaign Filing Officer webinar.
- April 26, the FPPC is hosting a Candidate/Treasurer webinar.

Video Tutorials

Commission video tutorials were accessed a total of 900 times in March. Form 700 videos were accessed 545 times, the Candidate/Treasurer video was accessed 213 times, and the filing officer videos were accessed 142 times.

C. New and Updated Educational Resources

None

D. Advice

The March Advice Letter Report is available on the FPPC website at <https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2022-advice-letter-reports/FPPC-advice-letter-report-mar-2022.html>.

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

- **Education:** The Education unit responded to 1,132 requests for technical assistance via telephone.
- **Requests for Advice:** The Email Advice and Conflict of Interest Code Program and Legal Division attorneys collectively responded to 1,239 email requests for advice, 273 of which were not responded to within 24 hours.
- **Advice Letters:** The Legal Division received 13 advice letter requests under the Political Reform Act and completed 11.

- **Section 1090 Letters:** The Legal Division received 3 advice letter request concerning Section 1090 and completed 9. This year to date, we have received 7 advice requests regarding Section 1090.

E. Miscellaneous Decisions

None

F. Potential Upcoming Regulation Projects

May

- Filing Officer Referrals - Provide specific criteria and requirements for filing officials submitting referrals to the Enforcement Division for campaign finance, SEI, behested payment, and lobbying reporting violations (pre-notice).
- Cryptocurrency - Consider revising prohibition on making and receiving campaign contributions via cryptocurrency (adoption).

June

- Press Policy – Provide specific rules governing the level of detail provided to the press and public regarding the status of pending Enforcement cases (adoption).
- Complaints against Commissioners – Require referral of any complaint or filing officer referral alleging a Commissioner violated the Act to the Office of the Attorney General (adoption).
- Direct Personal Benefit definition – Update the regulatory definition of “direct personal benefit” to reflect amendments made to Section 89521 by AB 1367, as well as other minor clean-up of existing regulations.

For more information on these and other regulation projects planned for 2022, go to <https://www.fppc.ca.gov/the-law/fppc-regulations.html>.

G. Conflict of Interest Codes

Adoptions and Amendments

State:

- California Science Center
- Department of Conservation
- Department of Finance

Multi-County:

- Amethod Public Schools
- Upper Mokelumne River Watershed Authority

- Metropolitan Water District of Southern California
- Rocketship Education
- Red Bluff Joint Union High School District

Exemptions

None

Extensions

None

H. Probable Cause Hearings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause does not constitute a finding a violation occurred. Respondents are presumed 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 Adrian Greer for Azusa School Board 2018 and Adrian Greer, Case No. 2021-00089.*** On April 1, 2022, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: On or around August 24, 2018 Greer failed to timely file a candidate intention statement in connection with Greer's candidacy in the November 6, 2018 General Election prior to receiving contributions, in violation of Section 85200.

Count 2: The Committee and Greer failed to timely file an amendment to the Committee's statement of organization with the Secretary of State within 10 days of qualifying as a committee, in violation of Sections 84101, subdivision (a) and 84103.

Count 3: The Committee and Greer failed to timely file a pre-election campaign statement for the reporting period of September 23, 2018 to October 20, 2018 in violation of Section 84200.5 subdivision (a) and 84200.8, subdivision (b).

Count 4: The Committee and Greer failed to timely file a semi-annual campaign statement for the reporting period of October 21, 2018 to December 31, 2018 in violation of Section 84200, subdivision (a).

Count 5: The Committee and Greer failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 to June 30, 2019 in violation of Section 84200, subdivision (a).

Count 6: The Committee and Greer failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 to December 31, 2019 in violation of Section 84200, subdivision (a).

- Count 7: Greer failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 to June 30, 2020 in violation of Section 84200, subdivision (a).
- Count 8: Greer failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2020 to December 31, 2020, in violation of Section 84200, subdivision (a).
- Count 9: Greer failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 to June 30, 2021, in violation of Section 84200, subdivision (a).
- Count 10: The Committee and Greer failed to timely file a 24-hour contribution report for a contribution in the amount of \$1,033 received on August 31, 2018, in violation of Section 84203.

2. *In the Matter of Carla J Neal for Assembly 2018, Carla J. Neal, and Stephen A. Smith, Case No. 18/714.* On April 1, 2022, probable cause was found to believe Respondents committed the following violations of the Act:

- Count 1: The Committee, Neal, and Smith failed to timely file an amendment to the Committee's statement of organization to report the Committee's date of qualification of February 21, 2018, by the March 5, 2018 due date, in violation of Government Code Sections 84101 and 84103.
- Count 2: The Committee, Neal, and Smith failed to timely file a pre-election campaign statement for the reporting period of April 22, 2018 to May 19, 2018, by the May 24, 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 3: The Committee, Neal, and Smith failed to timely file a pre-election campaign statement for the reporting period of July 1, 2018 to September 22, 2018, by the September 27, 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 4: The Committee, Neal, and Smith failed to timely file a semi-annual campaign statement electronically for the reporting period of October 21, 2018 to December 31, 2018, by the January 31, 2019 due date, in violation of Government Code Sections 84200, 84215 and 84605.
- Count 5: The Committee, Neal, and Smith failed to timely file a semi-annual campaign statement, electronically or in paper format, for the reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation of Government Code Sections 84200, 84215, and 84605.
- Count 6: The Committee, Neal, and Smith failed to timely file a semi-annual campaign statement, electronically and in paper format, for the reporting period of July 1,

2019 to December 31, 2019, by the January 31, 2020 due date, in violation of Government Code Sections 84200, 84215, and 84605.

Count 7: The Committee, Neal, and Smith failed to timely file a semi-annual campaign statement, electronically or in paper format, for the reporting period of January 1, 2020 to June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Sections 84200, 84215, and 84605.

Count 8: The Committee, Neal, and Smith failed to timely file a semi-annual campaign statement, electronically or in paper format, for the reporting period of July 1, 2020 to December 31, 2020, by the February 1, 2021 due date, in violation of Government Code Sections 84200, 84215, and 84605.

Count 9: The Committee, Neal, and Smith failed to timely file a semi-annual campaign statement, electronically or in paper format, for the reporting period of January 1, 2021 to June 30, 2021, by the August 2, 2021 due date, in violation of Government Code Sections 84200, 84215, and 84605.

Count 10: The Committee, Neal, and Smith failed to timely file a 24-hour contribution report to disclose a late contribution received on April 27, 2018, by the April 30, 2018 due date, in violation of Government Code Section 84203.

Count 11: The Committee, Neal, and Smith failed to timely file a 24-hour contribution report to disclose a late contribution received on May 22, 2018, by the May 23, 2018 due date, in violation of Government Code Section 84203.

Count 12: The Committee, Neal, and Smith failed to timely file a 24-hour contribution report to disclose a late contribution received on October 12, 2018, by the October 15, 2018 due date, in violation of Government Code Section 84203.

3. *In the Matter of Elizabeth Alcantar, Alcantar for City Council 2018, and Oscar Moreno, Case No. 18/1142.* On March 28, 2022, probable cause was found to believe that Respondents committed the following violations of the Act:

Count 1: Alcantar failed to timely file a statement of intention prior to the solicitation or receipt of any contribution or loan in connection with her candidacy, in violation of Government Code Section 85200.

Count 2: The Committee, Alcantar, and Moreno failed to timely file an amendment to the statement of organization to report the Committee's date of qualification of August 23, 2018, by the September 3, 2018 due date, in violation of Government Code Sections 84101 and 84103.

Count 3: The Committee, Alcantar, and Moreno failed to timely file a 24-hour contribution report to disclose a \$1,000 late contribution received on August 23, 2018, by the August 24, 2018 due date, in violation of Government Code Section 84203.

- Count 4: The Committee, Alcantar, and Moreno failed to timely file a semi-annual campaign statement for the reporting period of October 21, 2018 to December 31, 2018, by the January 31, 2019 due date, in violation of Government Code Section 84200.
- Count 5: The Committee, Alcantar, and Moreno failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation of Government Code Section 84200.
- Count 6: The Committee, Alcantar, and Moreno failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 to December 31, 2019, by the January 31, 2020 due date, in violation of Government Code Section 84200.
- Count 7: The Committee, Alcantar, and Moreno failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 to June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Section 84200.
- Count 8: The Committee, Alcantar, and Moreno failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2020 to December 31, 2020, by the February 1, 2021 due date, in violation of Government Code Section 84200.
- Count 9: The Committee, Alcantar, and Moreno failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 to June 30, 2021, by the August 2, 2021 due date, in violation of Government Code Section 84200.
- Count 10: Alcantar failed to timely file a 2019 Annual SEI, by the June 1, 2020 due date, in violation of Government Code Sections 87200 and 87203 and Regulation 18723.
- Count 11: Alcantar failed to timely file a 2020 Annual SEI, by the April 1, 2021 due date, in violation of Government Code Sections 87200 and 87203 and Regulation 18723.

4. *In the Matter of Cliff Mota, Case No. 2017-00954.* On March 28, 2022, probable cause was found to believe that Respondent committed the following violations of the Act:

- Count 1: Mota failed to timely file their 2016 Annual SEI by the April 3, 2017 due date, in violation of Government Code Section 87300.
- Count 2: Mota failed to timely file their 2017 Annual SEI by the April 2, 2018 due date, in violation of Government Code Section 87300.
- Count 3: Mota failed to timely file their Leaving Office SEI by the January 4, 2019 due date, in violation of Government Code Section 87300.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: LORESSA HON, CHIEF

A. New Employee Report

No New Staff to Report

B. Statement of Economic Interest (Form 700)

As of April 1, 2022, there were 17 Form 700 non-filers of the 2021/2022 Annual Form 700 filing from the 87200-filer (March 1st) group.