

STATE OF CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION 1102 Q Street • Suite 3050 • Sacramento, CA 95811 (916) 322-5660

EXECUTIVE STAFF REPORTS 15 2025 Commissio

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I. ENFORCEMENT DIVISION

STAFF: ANGELA J. BRERETON & CHRISTOPHER B. BURTON, ASSISTANT CHIEFS OF ENFORCEMENT

A. Overview

During the period of March 27, 2025, through April 30, 2025, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	47	16	40	118

The number of complaints and referrals received by the Enforcement Division increased considerably compared with the previous month.

For the month of April, more time to respond beyond the 14-day statutory period was needed for approximately 12 sworn complaints. Generally, additional time to respond was utilized in order to give respondents more time to respond to inquiries when it was requested.

Additionally, for the month of April, the Enforcement Division opened 144 cases, rejected 101 complaints and referrals, and closed a total of 137 cases including:

- 84 warning letters –statement of economic interests violations (72), campaign violations (7), advertisement violations (1), behested payment violations (2), and conflict of interests violations (2);
- 23 no action closure letters: PREP completed statement of economic interests violations (16), campaign violations (5) and advertisement violations (2);
- 15 no action closure letters alleging advertisement violations (2), campaign violations (4), and statement of economic interests violations (9);
- 11 approved stipulations from the March and April Commission meetings;
- 2 defaults approved from the October and February Commission meetings;
- 2 administrative terminations.

The Division had a total of 879 cases in various stages of resolution at the time of the April Monthly Report and currently has approximately 886 cases in various stages of resolution, including the 6 streamline and 3 mainline cases before the Commission as listed in the May Agenda. Net case openings since the last monthly report totaled 7.

B. Annual Statistics

The following is a chart that details the annual statistics for enforcement complaints, referrals and cases over the past six years. The statistics show a marked increase in complaints during election years while referrals were reduced in 2024.

	Ye	ear	2019	2020	2021	2022	2023	2024
1		omplaints eceived	744	1,390	606	1,379	653	1,456
2		eferrals	1,950	1,518	1,751	1,724	1,971	1,393
3	Co Re	otal omplaint and eferrals eccived	2,694	2,908	2,357	3,103	2,624	2,849
4	Ca	ises opened	1,820	1,155	1,185	990	831	1,403
5	Ca	uses closed ³	1,465	1,526	1,058	1,075	1,295	1,536
6		uses with nalties ¹	343	278	269	161	98	149
	a	Streamline cases	263	194	234	142	79	117
	b	Mainline cases	73	77	32	14	17	25
	c	Default cases	7	7	3	5	2	7
7		otal fines posed	\$797,384	\$1,940,107	\$472,248	\$617,548	\$376,531	\$802,238
8		arning ters issued	584	777	475	681	813	847
9		dministrative minations	104	62	59	53	87	80

¹ Total for lines 6a, 6b, and 6c.

10	Cases closed with violations found ²	1,031	1,117	803	895	998	1,076
11	Advisory letters issued	9	7	16	8	15	12
12	No action closure letters	423	402	237	217	296	469
	a PREP Completed				39	86	261

C. 2024-2025 Quarterly Caseload Summary

The following is a chart that compares the number of cases from given years at the end of each quarter during 2024 and 2025. Enforcement has successfully focused on the resolution of older cases.

	March 2024	June 2024	September 2024	December 2024	March 2025	Difference in Existing Caseload Overall
2018	12	8	8	5	3	-9
2019	23	22	21	12	11	-12
2020	118	103	84	40	24	-94
2021	148	124	105	68	54	-94
2022	213	191	165	131	119	-94
2023	276	260	236	194	171	-105
2024					318	

D. Presentations

None.

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.

E. 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 18360.3.

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 18360.1(e)(6)(C)(ii), 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.

Advertisements

In the Matter of Stand Up for Chico and Angela McLaughlin; FPPC No. 22/1047. Staff: Laura Columbel, Commission Counsel and Kaitlin Osborn, Special Investigator. Stand Up for Chico is a local general purpose committee. Angela McLaughlin served as the Committee's treasurer. The Committee and McLaughlin failed to timely file five pre-election campaign statements, in violation of Government Code Section 84200.5 (5 counts), one semi-annual campaign statement, in violation of Government Code Section 84200 (1 count), three 24-hour reports, in violation of Government Code Section 84204 (1 count), and failed to timely report one independent expenditure on a pre-election campaign statement, in violation of Government Code Section 84211 (1 count). In addition, the Committee failed to include the proper advertising disclosures on a yard sign, a social media landing page, and in a social media advertisement related to the November 8, 2022, General Election, in violation of Government Code Sections 84504.2, 84504.6, and 84506.5 (3 counts). Total Penalty: \$614 (Tier One).

Campaign Late Filer

In the Matter of Adrian Greer for Azusa School Board 2018 and Adrian Greer; FPPC No. 21/089. Staff: Marissa Corona, Senior Commission Counsel. Adrian Greer was a successful candidate for Azusa School Board in the November 6, 2018 General Election. Adrian Greer for Azusa School Board 2018 was Adrian Greer's candidate-controlled committee. Greer failed to timely file a Statement of Intention, in violation of Government Code Section 85200 (1 count). The Committee and Greer failed to timely file a Statement, in violation of Government Code Section 84103 (1 count). The Committee and Greer also failed to timely file one pre-election statement, in violation of Government Code Section 84200.5 (1 count), three semi-annual statements and four officeholder short form statements, in violation of Government Code Sections 84200 and 84206 (7 counts), and failed to timely file a 24-Hour Report, in violation of Government Code Section 84203 (1 count). Total Penalty: \$3,139 (Tier 1).

In the Matter of Bryan Rasch; FPPC No. 22/704. Staff: Jonathan Rivera, Commission Counsel. Bryan Rasch, a former Trustee of the Eastside Union School District Board, failed to

timely file two officeholder campaign statements in violation of Government Code Section 84200 and Regulation 18406 (2 counts). **Total Penalty: \$400 (Tier One).**

Statement of Economic Interests Late Filer/Reporter

In the Matter of Stewart Ginn; FPPC No. 24/775. Staff: Kristin E. Goulet, Commission Counsel. Stewart Ginn, an Independent Citizens Oversight Committee Member for the San Dieguito Union High School District, failed to timely file the Assuming Office and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). Total Penalty: \$1,000 (Tier One).

In the Matter of Francine Sylvia; FPPC No. 22/539. Staff: Kristin E. Goulet, Commission Counsel. Francine Sylvia, a Recreation Coordinator for the City of Los Angeles Department of Recreation and Parks, failed to timely file the Assuming Office, 2020 Annual, 2021 Annual, 2022 Annual, and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (5 counts). Total Penalty: \$600 (Tier One).

In the Matter of Aurelio Salazar, Jr.; FPPC No. 25/139. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Vanessa Greer, Political Reform Consultant. Aurelio Salazar, Jr. was a successful candidate for Salinas City Council in the November 5, 2024 General Election. Salazar failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). Total Penalty: \$200 (Tier One).

II. AUDITS & ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF OF AUDITS & ASSISTANCE

Audits are conducted per Government Code sections 90000 - 90008 of the Political Reform Act (the Act). The Act requires full disclosure of receipts and expenditures of candidates and committees and disclosure of the finances of lobbyists. The purpose of the audits is to determine the level of compliance of the auditees with the Act. The opinions expressed in the audit report reflect the level of compliance with the Act. The FPPC is not responsible for the contents of the candidate's documents. Audit reports are then submitted to the Enforcement Division for further review.

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 always 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 April 1, 2025, to April 30, 2025, the Audits and Assistance Division adopted one audit report, which contained one finding. Currently, the team has 44 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit adopted are as follows:

• Tim Behrens for CalPERS Retiree Board 2022 (ID# 1449819)

• Finding: Campaign Bank Account-\$9,700 Outstanding Balance

Two contributions totaling \$14,600, received during the period ending August 21, 2022, were partially refunded to the contributors in a combined amount of \$13,784 during the period ending December 31, 2022. However, these refunds were incorrectly reported as negative amounts on Schedule A of the Form 460 Campaign Disclosure Statement for the period ending December 31, 2022, rather than being reported on Schedule E as required. Furthermore, \$9,700 of the \$13,784 refunded remains outstanding and has not cleared the campaign bank account. This is despite the committee reporting a zero-bank account balance and its termination, as indicated by the Form 460 Termination Statement filed on January 28, 2023.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None.

B. Outreach and Training

Webinars & Workshops

- April 8, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Stephen Hernandez and Alex Castillo, presented. 30 people attended.
- April 16, the FPPC presented a Candidates/Treasurers webinar. Political Reform Consultants Adam Ramirez and Katie Ito, presented. 20 people attended.
- April 24, the FPPC presented a General Purpose Committee webinar. Political Reform Consultants Katie Ito and Stephen Hernandez, presented. 30 people attended.
- April 30, the FPPC presented a Behested Payments (Form 803) webinar. Political Reform Consultants Katie Ito and Stephen Hernandez, presented. 16 people attended.

Scheduled Webinars

- May 13, the FPPC is presenting a Campaign/Treasurer Getting Started webinar.
- May 21, the FPPC is presenting a Form 460/497 webinar.
- May 29, the FPPC is presenting a Campaign/Treasurer After Election webinar.

Video Tutorials: Commission video tutorials were accessed a total of 464 times in April. Form 700 videos were accessed 288 times, the Candidate/Treasurer video was accessed 94 times, and the filing officer videos were accessed 82 times.

C. New and Updated Educational Resources

None.

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments
Statement of Economic Interests Course	10	13	2	16
Campaign Course for Local Candidates and Candidate-Controlled Committees	3	6	0	2
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0
Advertisement Course for Candidates and Candidate-Controlled Committees	0	2	0	0

D. Political Reform Education Program (PREP):

E. Advice

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

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

- *Telephone*: The Education unit responded to 457 requests for technical assistance via telephone.
- *Email Advice:* Political Reform Consultants and Legal Division attorneys collectively responded to 569 email requests for advice, 424 of which were responded to within 24 hours and 468 of those were responded to within 48 hours.
- **PRA Advice Letters:** The Legal Division received 17 advice letter requests under the Political Reform Act and completed 8.
- *Section 1090 Letters:* The Legal Division received 4 advice letter requests concerning Section 1090 and completed 3.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

June

Contributions made by electronic transfer – New regulation requiring third-party payment platforms that process electronic campaign contributions to have know-your-customer (KYC) protocols that verify the identity of persons making contributions. (Pre-notice)

<u>August</u>

Committee reopening – Amend Regulation 18404.1 governing reopening of campaign committees to explicitly permit a committee to be reopened to report reimbursement for security expenses permitted by AB 2041, and to pay a debt unknown to the committee at the time of closing. (Adoption)

Contributions made by electronic transfer – New regulation requiring third-party payment platforms that process electronic campaign contributions to have know-your-customer (KYC) protocols that verify the identity of persons making contributions. (Adoption)

Notice of attribution of contributions – New provision requiring a candidate-controlled committee that transfers funds to another committee subject to attribution requirements to provide notice to the contributor to whom a contribution was attributed. (Pre-notice)

September

Enforcement penalties – Amend "streamline" regulations to clarify Enforcement's discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced penalty, require the Commission to directly approve streamline fines, and consider existing inclusions and exclusion criteria. (Pre-notice)

Probable cause proceedings – Amend the existing PC regulation to make the process more efficient and lessen unnecessary delays in conducting probable cause proceedings. (Pre-notice)

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

• State Lands Commission

Multi-County Agencies

- Tahoe Forest Hospital District
- California Montessori Project

- Antelope Valley Community College District
- Sierra Charter School
- East Turlock Subbasin Groundwater Sustainability Agency
- Cabrillo Community College District
- Chaffey Joint Union High School District
- Colusa Sutter Yolo Regional Child Support Agency
- Caliber Public Schools

Exemptions

None

Extensions

None

I. Probable Cause Proceedings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause exists when the evidence supports a reasonable belief or strong suspicion that a violation occurred, but does not constitute a finding a violation occurred. Respondents are presumed innocent of any violation of the Act until a violation is proven in a subsequent proceeding.

In the Matter of "Jackie" Chen Aka Jiading Chen Aka Jia D Chen Aka Jiacling Chen, Case No. 2024-01047. On April 7, 2025, probable cause was found based on the papers submitted that Respondent "Jackie" Chen committed the following violations of the Act:

- <u>Count 1</u>: Chen failed to timely file the first pre-election campaign statement (Form 460 or Form 470 Short Form, if eligible) covering the reporting period of January 1, 2024, through September 21, 2024, by the deadline of September 26, 2024, in connection with his candidacy during the November 5, 2024, General Election, in violation of Government Code Sections 84200.5, 84200.8, and 84206.
- <u>Count 2</u>: Chen failed to timely file the second pre-election campaign statement (Form 460 or Form 470 Short Form, if eligible) covering the reporting period of September 22, 2024, through October 19, 2024, by the deadline of October 24, 2024, in connection with his candidacy during the November 5, 2024, General Election, in violation of Government Code sections 84200.5, 84200.8, and 84206.
- <u>Count 3</u>: If Chen was not eligible to file a Form 470 Short Form, then Chen also failed to timely file a Form 410 Statement of Organization within 10 days of qualifying as a recipient committee, in violation of Section 84101.

In the Matter of Lila Gemellos, Case No. 2023-00706. On April 7, 2025, probable cause was found based on the papers submitted that Respondent committed the following violations of the Act:

- <u>Count 1</u>: Gemellos failed to timely file an Assuming Office SEI by the December 5, 2019 due date, in violation of Section 87300.
- <u>Count 2</u>: Gemellos failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.
- <u>Count 3</u>: Gemellos failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.
- <u>Count 4</u>: Gemellos failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.

In the Matter of Jesse Huang, Case No. 2024-00501. On April 11, 2025, probable cause was found based on the papers submitted that Respondent committed the following violations of the Act:

<u>Count 1</u> :	Huang failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of Government Code Section 87300.
<u>Count 2</u> :	Huang failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.
Count 3:	Huang failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.
<u>Count 4</u> :	Huang failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.
<u>Count 5</u> :	Huang failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Debbie Moser, Case No. 2024-00946. On April 11, 2025, probable cause was found based on the papers submitted that Respondent committed the following violations of the Act:

- <u>Count 1</u>: Moser failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.
- <u>Count 2</u>: Moser failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Thara Innocent, Case No. 2024-00816. On April 14, 2025, probable cause was found based on the papers submitted that Respondent Thara Innocent committed the following violations of the Act:

<u>Count 1</u> :	Innocent failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of Government Code Section 87300.
<u>Count 2</u> :	Innocent failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.
Count 3:	Innocent failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.
Count 4:	Innocent failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.
<u>Count 5</u> :	Innocent failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.
<u>Count 6</u> :	Innocent failed to timely file a Leaving Office SEI by the December 26, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Phillip Wiley, Case No. 2024-00734. On April 15, 2025, probable cause was found based on the papers submitted to believe Respondent committed the following violations of the Act:

<u>Count 1</u> :	Wiley failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of Government Code Section 87300.
<u>Count 2</u> :	Wiley failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.
<u>Count 3</u> :	Wiley failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.
<u>Count 4</u> :	Wiley failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.
<u>Count 5</u> :	Wiley failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Stevenson Kiang, Case No. 2024-01013. On April 22, 2025, probable cause was found based on the papers submitted to believe Respondent committed the following violation of the Act:

<u>Count 1</u>: Kiang failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Richard Corvera-Hernandez, Case No. 2024-00589. On April 22, 2025, probable cause was found based on the papers submitted that Respondent committed the following violations of the Act:

<u>Count 1</u>: Corvera-Hernandez failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.
<u>Count 2</u>: Corvera-Hernandez failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.
<u>Count 3</u>: Corvera-Hernandez failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.

In the Matter of WeLead OC Fund and Karen Hinks, Case No. 2024-00589. On April 22, 2025, probable cause was found based on the papers submitted that Respondents committed the following violations of the Act:

- <u>Count 1</u>: The Committee and Hinks failed to timely file a statement of organization with the Secretary of State and the City of Santa Ana within 10 days of qualifying as a committee, in violation of Government Code Section 84222, 84101, and Regulation 18422.
- <u>Count 2</u>: The Committee and Hinks failed to timely file a 24-hour independent expenditure report for the late independent expenditure of \$3,873.07 in support of Beatriz Mendoza, by the October 24, 2019 due date, in violation of Government Code Section 84204.
- <u>Count 3</u>: The Committee and Hinks failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 through December 31, 2019 by the January 31, 2020 due date, in violation of Government Code Section 84200.
- <u>Count 4</u>: The Committee and Hinks failed to include the correct name of the committee on the advertisement, causing confusion about the identity of the committee or person(s) responsible for the mailing, and failed to conform to the advertisement disclosure rules for a print advertisement by failing to include the language, "Ad paid for by" and to place the advertisement disclosure statement in a drawn box, in violation of Government Code Section 84502 and 84504.2.

In the Matter of Steven Sanchez, Case No. 2022-00887. On April 25, 2025, probable cause was found based on the papers submitted that Respondent committed the following violations of the Act:

<u>Count 1</u>: As a candidate, Sanchez failed to timely file a pre-election campaign statement with

the Santa Clara County Registrar of Voters by the September 29, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

- <u>Count 2</u>: Sanchez failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due date, in violation of Government Code Section 84200.
- <u>Count 3</u>: Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 30, 2023 by the January 31, 2024 due date, in violation of Government Code Section 84200.
- <u>Count 4</u>: Sanchez failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2024 through June 30, 2024 by the July 31, 2024 due date, in violation of Government Code Section 84200.
- <u>Count 5</u>: Sanchez failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2024 through December 30, 2024 by the January 31, 2025 due date, in violation of Government Code Section 84200.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. Hiring Process

Executive Division

Enforcement Division Chief

Legal Division

Attorney Political Reform Consultant

B. Statement of Economic Interest (SEI, Form 700)

April 1 Filing Status

As of May 1, 2025, 16,166 2024 annual statements, representing approximately 96% of the total, have been received and processed. The first non-filer letters were sent out on May 1, 2025.

Entity	Total	Filed	Not Filed
Cities A - M	3244	3042	202
Cities N - Z	2452	2311	141
Counties	797	770	27
GSA	1559	1448	111
Keenan	18	18	0
Legislative Staffers	1548	1531	17
Multi-County Agencies	4516	4344	172
State Agencies	2787	2702	85
Total	16,921	16,166	755
		96%	4%

SEI Unit May 2025 Summary

- Referred 104 cases to the Enforcement
- Issued 5 fine letters
- Issued 378 Non-filer letters and 11 Amendment letters
- Processed 43 Form 462
- Responded 5072 emails from <u>form700@fppc.ca.gov</u> and 101 phones calls
- Re-certified 8 existing local e-filing systems and approved 1 new local e-filing system

C. Collection/Revenue

July 2024 - April 2025 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 40,000	-	-	\$ 40,000
SEI Fine	\$ 5,775	\$ 20,176	\$ 2,551	\$ 28,502
PREP	\$ 502	\$ 13,650	-	\$ 14,152
Enforcement Collection	\$ 9,703	\$ -1,072	\$ 6,838	\$ 15,469
Enforcement Stipulations	\$ 439,515	\$ 148,981	-	\$ 588,496
Reimbursement	\$ 60,670	-	-	\$ 60,670
Total	\$ 556,165	\$ 181,735	\$ 9,389	\$ 747,289