



EXECUTIVE STAFF REPORTS

March 20, 2025, Commission Hearing

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I. ENFORCEMENT DIVISION

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

A. Overview

During the period of February 1, 2025, through February 28, 2025, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	30	5	33	85

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

For the month of February, more time to respond beyond the 14-day statutory period was needed for approximately 5 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 February, the Enforcement Division opened 96 cases, rejected 64 complaints and referrals, and closed a total of 106 cases including:

- 58 warning letters – advertisement violations (1), campaign violations (6), conflict of interests (1), and statement of economic interests violations (50);
- 31 no action closure letters: PREP completed – statement of economic interests violations (25), campaign violations (4) and advertisement violations (2);
- 12 no action closure letters alleging – advertisement violations (1), campaign violations (1), behested payment violations (1), and statement of economic interests violations (9);
- 3 approved stipulations from the January and February Commission meetings;
- 1 advisory letter;
- 1 case closed as a duplicate.

The Division had a total of 887 cases in various stages of resolution at the time of the January Monthly Report and currently has approximately 877 cases in various stages of resolution, including the 12 streamline cases and 1 mainline case before the Commission as listed in the February Agenda. Net case closures since the last monthly report totaled 10.

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.

	Year	2019	2020	2021	2022	2023	2024
1	Complaints Received	744	1,390	606	1,379	653	1,452
2	Referrals Received	1,950	1,518	1,751	1,724	1,971	1,387
3	Total Complaint and Referrals Received	2,694	2,908	2,357	3,103	2,624	2,839
4	Cases opened	1,820	1,155	1,185	990	831	1,402
5	Cases closed ³	1,465	1,526	1,058	1,075	1,295	1,536
6	Cases with penalties 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	Total fines imposed	\$797,384	\$1,940,107	\$472,248	\$617,548	\$376,531	\$802,238
8	Warning letters issued	584	777	475	681	813	847
9	Administrative terminations	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	1,054
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. 2023-2024 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. Enforcement has successfully focused on the resolution of older cases.

	December 2023	March 2024	June 2024	September 2024	December 2024	Difference in Existing Caseload Overall
2017	1	0	0	0	0	-1
2018	21	12	8	8	5	-16
2019	39	23	22	21	12	-27
2020	153	118	103	84	40	-113
2021	167	148	124	105	68	-99
2022	248	213	191	165	131	-117
2023	323	276	260	236	194	-129

D. Presentations

None.

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

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.

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.

Recordkeeping

In the Matter of We the Parents MB, Fred Taylor and Andrea Laraneta; FPPC No. 23/171.

Staff: Vanessa Jimmy, Commission Counsel and Ann Flaherty, Special Investigator. We the Parents MB was a primarily formed ballot measure committee. Andrea Laraneta served as the Committee's treasurer and Fred Taylor served as the principal officer. The Committee, Taylor, and Laraneta failed to include the proper advertisement disclosures in mailers, signs, emails, and an online newsletter, in violation of Government Code Sections 84502, 84504.2, and 84504.3 (3 counts), failed to maintain adequate records, in violation of Government Code Section 84104 and Regulation 18401 (1 count), accepted 16 cash contributions over \$100 and paid a cash expenditure over \$100, in violation of Government Code Section 84300 (2 counts), failed to timely file a Statement of Organization within 10 days of committee qualification, in violation of Government Code Section 84101 (1 count), failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts), and failed to timely file one semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). Chief Discretion was used in this matter to include advertisement disclosure violation counts 1 and 2 in Tier One, to include recordkeeping violation count 1 in Tier One, to reduce the base penalty for cash contribution/expenditure violation counts 1 and 2, and to exclude campaign statement/report late filer violations counts 2-4 from receiving a penalty. **Total Penalty: \$2,615 (Tier One).**

Advertisements

In the Matter of Committee to Elect Miguel Madrid City Council 2020, Miguel Madrid, Jr., and Sandra Males-Madrid; FPPC No. 21/146.

Staff: Vanessa Jimmy, Commission Counsel and Jay Gehres, Special Investigator. Miguel Madrid was an unsuccessful candidate for City Council in the November 3, 2020 General Election. Committee to Elect Miguel Madrid City Council 2020 was Miguel Madrid's candidate-controlled committee. Sandra Males-Madrid served as the Committee's treasurer. The Committee, Madrid, and Males-Madrid failed to include the proper advertisement disclosures on a mailer, in violation of Government Code Section 84504.2 (1 count); and failed to timely file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts), one Statement of Organization, in violation of Government Code Section 84103 (1 count), one Campaign Statement Short Form Supplement, in violation of Government Code Section 84206 (1 count), and one semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). Chief Discretion was used in this matter to include advertisement disclosure violation count 1 in Tier One and to exclude

campaign statement/report late filer violations counts 2 and 3 from receiving a penalty. Campaign statement/report late filer violations counts 4 and 5 are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$612 (Tier One).**

Cash and In-Kind Contributions and/or Expenditures

In the Matter of Sherilyn Long for City Council 2022, Sherilyn Long, and Robert Rego; FPPC No. 23/012. Staff: Marissa Corona, Senior Commission Counsel and Special Investigator, Kaitlin Osborn. Sherilyn Long was an unsuccessful candidate for Yucaipa City Council in the November 8, 2022 General Election. Sherilyn Long for City Council was Long's candidate-controlled committee. Robert Rego served as the Committee treasurer from October 6, 2022 through October 25, 2022. The Committee and Long failed to timely file a 24-Hour Report, in violation of Government Code Section 84203 (1 count) and failed to accurately report all contributions and expenditures on one preelection campaign statement, in violation of Government Code Section 84211 (1 count). The Committee, Rego and Long failed to accurately report all contributions and expenditures on one preelection campaign statement, in violation of Government Code Section 84211 (1 count) and improperly accepted cash contributions, in violation of Government Code Section 84300 (4 counts). Chief Discretion was used in this matter to include counts 4 and 5 in Tier One and resolve counts 6 and 7 with a Warning Letter (these counts are included in the streamline stipulation as a \$0 penalty). **Total Penalty: \$602 (Tier One).**

Campaign Late Filer/Reporter

In the Matter of California Society for Respiratory Care Political Action Committee and Dave Wenhold; FPPC No. 25/023. Staff: Chance Felkins, Commission Counsel. The respondents were represented by Ashlee Titus of Bell McAndrews & Hiltachk, LLP. California Society for Respiratory Care Political Action Committee is a state general purpose committee. Dave Wenhold serves as the Committee's treasurer. The Committee and Wenhold failed to timely file 11 semi-annual campaign statements, in violation of Government Code Section 84200 (11 counts). Counts 2-4, and 8-11 are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$1,653 (Tier One).**

In the Matter of Christopher Apodaca; FPPC No. 24/753. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Vanessa Greer, Political Reform Consultant. Christopher Apodaca was a successful candidate for ABC Unified School District in the November 3, 2015 General Election. Apodaca failed to timely file a Candidate and Officeholder Short Form campaign statement for 2023, in violation of Government Code Section 84206 (1 count). Chief Discretion was used in this matter to include count 1 in Tier One. **Total Penalty: \$300 (Tier One).**

Statement of Economic Interests Late Filer

In the Matter of David Tonna; FPPC No. 24/330. Staff: Angela J. Brereton, Assistant Chief of Enforcement and Shaina Elkin, Associate Governmental Program Analyst. David Tonna, as a member of the Santa Clara County Assessment Appeals Officials Board II, failed to timely file

the 2021, 2022, and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (3 counts). Chief Discretion was used in this matter to exclude count 3 from receiving a penalty. **Total Penalty: \$800 (Tier One).**

In the Matter of Ashley Leon-Vazquez; FPPC No. 25/161. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Ashley Leon-Vazquez, a Commission Member for the California Commission on Disability Access, failed to timely file a 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Anup Patel; FPPC No. 25/040. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Anup Patel, Treasurer for the City of Beaumont, failed to timely file a 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Margo Wheeler; FPPC No. 25/162. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Margo Wheeler, a Planning Commissioner for the City of Seal Beach, failed to timely file a 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Christopher Fink; FPPC No. 25/217. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Fela Williams, Staff Services Analyst. Christopher Fink, a Physician with the Santa Clara Valley Medical Center, failed to timely file a 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Danthia Gil; FPPC No. 25/118. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Fela Williams, Staff Services Analyst. Danthia Gil, a Member of the Board of the Barona Indian Charter School, failed to timely file a 2022 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (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 February 1, 2025, to February 28, 2025, the Audits and Assistance Division adopted one audit report, with no findings. Currently, the team has 32 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit adopted are as follows:

- **Pacheco for CalPERS Board 2021 (ID# 1437959)**
 - No findings noted.

C. Public Draw Update

A public draw was held on February 12, 2025, to select legislative districts, lobbying firms and lobbyist employers. The results of the drawing are posted on the draw webpage at <https://www.fppc.ca.gov/transparency/audit-program/drawing-schedule---results.html>. A link to the recording of the draw is also available for public viewing on the above page.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None.

B. Outreach and Training

Webinars & Workshops

- February 11, the FPPC presented a Statement of Economic Interests Filers workshop requested by California Earthquake Authority. Political Reform Consultant, Alex Castillo, and Telephone Advice & Education Outreach Manager, Vanessa Manriquez, presented. 17 people attended.
- February 12, the FPPC presented a Behested Payments (Form 803) webinar requested by California League of Cities. Senior Commission Counsel, Karen Harrison, and Telephone Advice & Education Outreach Manager, Vanessa Manriquez, presented. 77 people attended.
- February 20, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Adam Ramirez and Stephen Hernandez, presented. 107 people attended.
- February 24, the FPPC presented a Statement of Economic Interests Filers webinar requested by San Diego County Sheriff's Office. Political Reform Consultants Alex Castillo and Adam Ramirez, presented. 55 people attended.
- February 25, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants, Stephen Hernandez and Adam Ramirez, presented. 64 people attended.

Scheduled Webinars

- March 11, the FPPC is presenting a Statement of Economic Interests Filing Officer webinar.
- March 18, the FPPC is presenting a Statement of Economic Interest Filers webinar.

Video Tutorials: Commission video tutorials were accessed a total of 725 times in February. Form 700 videos were accessed 587 times, the Candidate/Treasurer video was accessed 42 times, and the filing officer videos were accessed 96 times.

C. New and Updated Educational Resources

- [Behested Payment Reporting Soliciting Charitable Donations in Response to a Crisis Fact Sheet](#)

D. Political Reform Education Program (PREP):

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments
Statement of Economic Interests Course	14	25	2	30
Campaign Course for Local Candidates and Candidate-Controlled Committees	3	7	0	5
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0
Advertisement Course for Candidates and Candidate-Controlled Committees	4	5	0	4

E. Advice

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

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

- **Telephone:** The Education unit responded to 546 requests for technical assistance via telephone.
- **Email Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 806 email requests for advice, 311 of which were not responded to within 24 hours and 245 of those were not responded to within 48 hours.

- ***PRA Advice Letters:*** The Legal Division received 15 advice letter requests under the Political Reform Act and completed 12.
- ***Section 1090 Letters:*** The Legal Division received 5 advice letter requests concerning Section 1090 and completed 5.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

April

Mandatory Electronic Filing of SEIs with the FPPC – Amend various regulations concerning filing of statements of economic interests to implement AB 1170, which requires those who file original SEIs with the FPPC to do so electronically using the FPPC electronic filing system. (Adoption)

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

- *CA Student Aid Commission*
- *Department of State Hospitals*

Multi-County Agencies

- *Winters Joint Unified School District*
- *Pioneer Community Energy*

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 Karen Arnold, Case No. 2024-01190. On February 5, 2025 probable cause was found, after a hearing, to believe Respondent committed the following violation of the Act:

Count 1: Arnold had a conflict of interest when, as a member of the Board of Directors for the Mendocino Coast Healthcare District, Arnold voted on a governmental decision that had a reasonably foreseeable material financial effect on Arnold's financial interest, Mendocino Coast Clinic, in violation of Government Code Section 87100.

In the Matter of Luhua Cheng, Case No. 2023-00711. On February 26, 2025, probable cause was found, on the papers, that Respondents committed the following violations of the Act:

Count 1: Cheng failed to timely file a 2021 Annual SEI by April 1, 2022, in violation of Section 87300.

Count 2: Cheng failed to timely file a 2022 Annual SEI by April 3, 2023, in violation of Section 87300.

Count 3: Cheng failed to timely file a 2023 Annual SEI by April 1, 2024, in violation of Section 87300.

In the Matter of Wayne Nelson, Case No. 2024-00032. On March 4, 2025, probable cause was found, on the papers, to believe Respondent committed the following violations of the Act:

Count 1: Nelson failed to timely file their 2022 Annual SEI by April 3, 2023 due date, in violation of Section 87300.

Count 2: Nelson failed to timely file their 2023 Annual SEI by April 2, 2024 due date, in violation of Section 87300.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. Hiring Process

Enforcement Division: Enforcement Division Chief

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

March 3 Filing Status

As of March 6, 2025, 98% of the March 3 group have submitted Form 700 electronically. Compared to last year, the on-time filing rate has increased by approximately 5%, while the number of non-filers has decreased by 5%.

March 3 Group	Total	Filed on time	Filed late	Not Filed
Constitutional Officers	59	51	1	7
Courts	2301	2231	20	50
Legislature	118	118	0	0
State Agencies	18	17	0	1
Total	2496	2417	20	58
		97%	1%	2%

April 1 Filing Status

The annual filing notification email was sent on 1/2/2025, and 1st reminder email was sent on 3/2/2025.

SEI Unit February 2025 Summary

- Referred 1 case to the Enforcement
- Issued 26 fine letters
- Issued 538 Non-filer letters and 5 Amendment letters
- Processed 33 Form 462
- Responded 4853 emails from form700@fppc.ca.gov and 316 phones calls

- Re-certified 2 existing local e-filing systems and approved 1 new local e-filing systems

C. Collection/Revenue

July 2024 – February 2025 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$36,000	-	-	\$ 36,000
SEI Fine	\$ 5,375	\$ 15,966	\$ 1,151	\$ 22,492
PREP	\$ 452	\$ 11,000	-	\$ 11,452
Enforcement Collection	\$ 9,703	\$ -1,197	\$ 4,324	\$ 12,830
Enforcement Stipulations	\$ 313,980	\$ 121,861	-	\$ 435,841
Reimbursement	\$ 56,316	-	-	\$ 56,316
Total	\$ 421,826	\$ 147,630	\$5,475	\$ 574,931