



CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

EXECUTIVE STAFF REPORTS

October 16, 2025, Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: KENDALL L.D. BONEBRAKE, CHIEF OF ENFORCEMENT

A. Overview

During the period of September 1, 2025, through September 30, 2025, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	57	11	37	184

The number of complaints received by the Enforcement Division in September increased compared with the previous month. The number of referrals received by the Enforcement Division also increased.

For the month of September, more time to respond beyond the 14-day statutory period was needed for approximately 23 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 September, the Enforcement Division opened 96 cases, rejected 82 complaints and referrals, and closed a total of 84 cases including:

- 46 warning letters –statement of economic interests violations (39) and campaign violations (7)
- 20 no action closure letters: PREP completed – statement of economic interests violations (13) and campaign violations (7);
- 5 no action closure letters alleging – statement of economic interests violations (5);
- 10 approved stipulations from the August and September Commission meetings;
- 3 administrative terminations;

The Division had a total of 896 cases in various stages of resolution at the time of the August Monthly Report and currently has approximately 908 cases in various stages of resolution, including the 3 streamline and 1 mainline cases before the Commission as listed in the September Agenda. Net case openings since the last monthly report totaled 12.



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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	1,456
2	Referrals Received	1,950	1,518	1,751	1,724	1,971	1,393
3	Total Complaint and Referrals Received	2,694	2,908	2,357	3,103	2,624	2,849
4	Cases opened	1,820	1,155	1,185	990	831	1,403
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.



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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.

	September 2024	December 2024	March 2025	June 2025	September 2025	Difference in Existing Caseload Overall
2018	8	5	3	1	1	-7
2019	21	12	11	8	8	-13
2020	84	40	24	14	11	-73
2021	105	68	54	42	33	-72
2022	165	131	119	104	91	-74
2023	236	194	171	154	148	-88
2024	--	--	318	295	270	-48

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.



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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.

Campaign Late Filer/Reporter

In the Matter of Lisa Davis CUSD School Board 2020 and Lisa Davis; FPPC No. 21/123.

Staff: Jonathan Rivera, Commission Counsel. Lisa Davis was a successful candidate for the Capistrano Unified School District in the November 3, 2020 General Election. Lisa Davis CUSD School Board 2020 was Davis' candidate-controlled committee. The Committee and Davis failed to timely file one pre-election campaign statement, in violation of Government Code Sections 84200.5 and 84200.8 (1 count) and five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts). The Committee and Davis also failed to timely report the occupation and employer of contributors on one pre-election campaign statement and expenditures on a semi-annual campaign statement, in violation of Government Code Section 84211 (2 counts). **Total Penalty: \$2,586 (Tiers One and Two).**

Statement of Economic Interests Late Filer/Reporter

In the Matter of Edrie De Los Santos; FPPC No. 25/936. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Fela Williams, Staff Services Analyst. Edrie De Los Santos, a Consultant with the City of Monterey, failed to timely file an Assuming Office and the 2024 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: \$400 (Tier One).**

In the Matter of John Hoadley; FPPC No. 25/942. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. John Hoadley, a Member for the Sea Urchin Commission, 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).**



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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 September 1, 2025, to September 30, 2025, no audit reports were adopted by the Audits and Assistance Division. Currently, the team has 48 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.



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III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None.

B. Outreach and Training

Webinars & Workshops

- September 11, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Stephen Hernandez and Kathryn Ito, presented. 20 people attended.
- September 17, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Alexandra Miner and Stephen Hernandez, presented. 9 people attended.
- September 23, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Kathryn Ito and Alexandra Miner, presented. 31 people attended.

Scheduled Webinars

- October 8, the FPPC is presenting a Statement of Economic Interests Filers webinar.
- October 14, the FPPC is presenting a Completing Campaign Forms 460/497 webinar.
- October 22, the FPPC is presenting a Candidate/Treasurer – After the Election webinar.

Video Tutorials: Commission video tutorials were accessed a total of 297 times in September. Form 700 videos were accessed 172 times, the Candidate/Treasurer video was accessed 77 times, and the filing officer videos were accessed 48 times.

C. New and Updated Educational Resources

- Updated [Advertising Disclosure Charts](#)



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D. Political Reform Education Program (PREP):

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	28	17	0	50	2
Campaign Course for Local Candidates and Candidate-Controlled Committees	5	7	0	7	0
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0	0
Advertisement Course for Candidates and Candidate-Controlled Committees	1	0	0	1	0

E. Advice

The [September 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 September, the Legal Division responded to the following requests for advice:

- **Telephone:** The Education unit responded to 260 requests for technical assistance via telephone.
- **Email Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 384 email requests for advice, 265 of which were responded to within 24 hours and 301 were responded to within 48 hours.
- **PRA Advice Letters:** The Legal Division received 7 advice letter requests under the Political Reform Act and completed 6.
- **Section 1090 Letters:** The Legal Division received 0 advice letter requests concerning Section 1090 and completed 4.



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F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

November

Contributions Made by Electronic Transfer and Committee Use of Gift Cards –Proposed amendments to require committees contracting with payment processors to receive contributions via electronic transfer to ensure the payment processor employs specific procedures to verify the identity of the contributor, and assist in preventing impermissible contributions. The proposed regulations would also place prohibitions and limits on the use of prepaid gift cards for making contributions and expenditures. (Adoption)

January

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. (Adoption)

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

- Office of Tax Appeals
- Native American Heritage Commission
- Public Employment Relations Board
- State Personnel Board
- Sacramento-San Joaquin Delta Conservancy
- Commission on Peace Officer Standards and Training

Multi-County Agencies

- Owens Valley Groundwater Authority
- Midpeninsula Regional Open Space District



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- Truckee Donner Public Utility District
- Sage Oak Charter Schools
- Cuyama Joint Unified School District
- Tahoe Resource Conservation District
- Glenn-Colusa Irrigation District
- San Joaquin Tributaries Authority

Repeals

None

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.

None.



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IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

Josh Donner, Executive Fellow

B. Hiring Process

Legal Division

Attorney
Political Reform Consultant
Staff Services Analyst

Enforcement Division

Special Investigator
Attorney Supervisor

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

2025 Year-to-date E-Filing Summary

As of October 2, 2025, 25,284 annual, assuming office, leaving office, and candidate statements filed using the FPPC's E-filing system.

Entity	Annual	Assuming	Leaving	Candidate	Total
Cities A - M	3,193	711	519	14	4,437
Cities N - Z	2,415	516	394	29	3,354
Constitutional officers	59	11	14	0	84
Counties	791	164	119	4	1,078
Courts	2,297	113	93	0	2,503



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Groundwater Sustainability Agency	1,525	179	89	0	1,793
Keenan	18	1	1	0	20
Legislative Staffers	1,541	327	293	0	2,161
Legislature	118	3	11	16	148
Multi-County Agencies	4,460	1023	749	0	6,232
State Agencies	2,791	394	288	1	3,474
Total	19,208	3,442	2,570	64	25,284

SEI Unit September 2025 Summary

- Referred 31 cases to the Enforcement
- Issued 40 fine letters
- Issued 189 Non-filer letters and 127 Amendment letters
- Processed 26 Form 462
- Responded 1687 emails from form700@fppc.ca.gov and 72 phones calls
- Re-certified 3 existing local e-filing systems

D. Collection/Revenue

July 2025 – September 2025 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 7,000	-	-	\$ 7,000
SEI Fine	\$ 900	\$ 9,400	\$ 800	\$ 11,100
PREP	-	\$ 4,700	-	\$ 4,700
Enforcement Collection	\$ 400	-	\$ 235	\$ 635
Enforcement Stipulations	\$ 35,330	\$ 18,141	-	\$ 53,471



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Reimbursement	\$ 212,349	-	-	\$ 212,349
Total	\$ 255,979	\$ 32,241	\$ 1,035	\$ 289,255