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10 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
11 **STATE OF CALIFORNIA**

12 In the Matter of:) FPPC No. 2018-01357
13)
14 CITY OF GARDEN GROVE and SCOTT) **STIPULATION, DECISION, AND ORDER**
STILES) Date Submitted to Commission: October 2023
15)
16 Respondents.)
17)
18)

19 **INTRODUCTION**

20 Respondent City of Garden Grove (the “City”) is a city in Orange County with its own charter
21 and authority. Respondent Scott Stiles (“Stiles”) was the city manager of the City from August 2015 to
22 February 2023. Under the Political Reform Act (the “Act”),¹ campaign related mailings are prohibited
23 from being sent at public expense if they unambiguously urge for the passage or defeat of a ballot
24 measure. The Act also maintains that a local government agency that spends \$1,000 or more in public
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26 ¹ The Act is contained in Government Code sections 81000 through 91014. All statutory references are to the
27 Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in
28 Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2,
Division 6 of the California Code of Regulations, unless otherwise indicated.

1 funds to advocate for or against a ballot measure qualifies as a campaign committee and must comply
2 with all provisions of the Act related to campaign committees, including filing campaign statements and
3 reports. Additionally, campaign related mailings must adhere to certain advertising disclaimer
4 regulations. The City and Stiles violated the Act by distributing a campaign related mailing at public
5 expense, failing to include a disclosure statement on the mailed advertisement, and failing to timely file
6 one late independent expenditure report and one semi-annual campaign statement related to the
7 expenditure.

8 **SUMMARY OF THE LAW**

9 The violations in this case occurred in 2018, so all legal references and discussions of the law
10 pertain to the Act’s provisions as they existed at that time.

11 **Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act**

12 When enacting the Political Reform Act, the people of California found and declared that
13 previous laws regulating political practices suffered from inadequate enforcement by state and local
14 authorities.² For this reason, the Act is to be construed liberally to accomplish its purposes.³

15 One purpose of the Act is to promote transparency by ensuring that expenditures made in
16 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper
17 practices are inhibited.⁴ In furtherance of this purpose, the Act establishes a comprehensive campaign
18 reporting system⁵ and requires any committee that supports or opposes a ballot measure to print its
19 name as part of any advertisement.⁶ Another purpose of the Act is to provide adequate enforcement
20 mechanisms so the Act will be “vigorously enforced.”⁷

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24 ² Section 81001, subd. (h).

25 ³ Section 81003.

26 ⁴ Section 81002, subd. (a).

27 ⁵ Sections 84200, *et seq.*

28 ⁶ Section 84506.

⁷ Section 81002, subd. (f).

1 **Prohibited Campaign Related Mailing Sent at Public Expense**

2 The Act prohibits sending a newsletter or other mailing at public expense.⁸ While the Act seems
3 to be written in absolute terms, regulations have focused this prohibition to reflect the intent of the Act.
4 Specifically, newsletters and other mailings are prohibited if (1) the item is a tangible item; (2) the item
5 expressly advocates the qualification, passage, or defeat of a clearly identified measure, or
6 unambiguously urges a particular result in an election; (3) public moneys are paid to distribute the item,
7 or to prepare the item, for more than \$50, with the intent of sending the item; and (4) more than 200
8 substantially similar items are sent during the course of an election.⁹

9 A mailing expressly advocates for or against a measure if it contains words like “vote for,”
10 “elect,” “support,” “defeat,” or “reject” in relation to a specific candidate or ballot measure.¹⁰ If a
11 mailing does not contain express language it still may unambiguously urge a particular result in an
12 election in one of two ways: (1) when it clearly is campaign material or campaign activity, such as
13 bumper stickers, billboards, door-to-door canvassing, posters, advertising “floats,” or mass media
14 advertising;¹¹ or (2) when the style, tenor, and timing of the communication can be reasonably
15 characterized as campaign material and not a fair presentation of facts serving only an informational
16 purpose.¹² Some factors to consider when assessing style, tenor, and timing include, but are not limited
17 to whether the communication is (1) funded from a special appropriation related to the measure as
18 opposed to a general appropriation; (2) consistent with the normal communication pattern for the
19 agency; (3) consistent with the style of other communications issued by the agency; and (4) using
20 inflammatory or argumentative language.¹³

21 The Commission adopted Regulation 18420.1 based on the California Supreme Court’s decision
22 in *Vargas v. City of Salinas, et. al.* (2009) 46 Cal. 4th 1.¹⁴ In *Vargas*, the Court relied heavily on its
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24 ⁸ Section 89001.

25 ⁹ Regulation 18901.1, subd. (a).

26 ¹⁰ Regulation 18225, subd. (b)(2).

27 ¹¹ Regulation 18420.1, subd. (b)(1).

28 ¹² Regulation 18420.1, subd. (b)(2).

¹³ Regulation 18420.1, subd. (d).

¹⁴ Fair Political Practices Commission, Minutes of Meeting, Public Session, Sept. 10, 2009, item no. 25, page 3.

1 decision in *Stanson v. Mott* (1976) 17 Cal. 3d 206. *Stanson* established the analysis for determining
2 when communications by a governmental agency that do not contain express advocacy still constitute
3 campaign activity. The Court went on to conclude that certain publicly financed literature that is not
4 clearly campaign material and that purports to contain only relevant information can be prohibited
5 campaign activity depending on the “style, tenor and timing of the publication.”¹⁵

6 Neither *Vargas* nor *Stanson* directly concerned any provisions of the Act. They were decided
7 based on the constitutional prohibition against unauthorized use of public funds. But, since in those
8 cases the State Supreme Court had defined when government agencies are prohibited from using public
9 moneys to pay for communications related to ballot measures, the Commission adopted the parameters
10 described in *Vargas* for determining when a government agency makes contributions and independent
11 expenditures under the Act.¹⁶

12 **Advertisement Disclosures**

13 An advertisement includes any general or public communication which is authorized and paid
14 for by a committee for the purpose of supporting or opposing one or more ballot measures.¹⁷ More
15 importantly, such an advertisement, that is paid for by an independent expenditure, must include a
16 disclosure statement that identifies the name of the committee. “Paid for by” should immediately
17 precede the committee’s name.¹⁸ Finally, the law requires that the disclosure area look a specific way,
18 including, the text appearing in an Arial or equivalent type of at least 10-point and being in a contrasting
19 color and printed or drawn on the bottom of at least one page that is set apart from any other printed
20 matter.¹⁹

21 **Campaign Statements and Reports**

22 A committee is any person or combination of persons who, in a calendar year, receives
23 contributions totaling \$2,000 or more; makes independent expenditures totaling \$1,000 or more; or
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25 ¹⁵ *Id.* at 222.

26 ¹⁶ Fair Political Practices Commission, Minutes of Meeting, Public Session, Sept. 10, 2009, item no. 25, page 3.

27 ¹⁷ Section 84501.

28 ¹⁸ Section 84502.

¹⁹ Section 84504.2.

1 makes contributions totaling \$10,000 or more to or at the behest of candidates or other committees.²⁰
2 When a state or local governmental agency uses public moneys for a communication that (1) expressly
3 advocates for or against a clearly identified candidate or ballot measure or (2) unambiguously urges a
4 particular result in an election, the Act identifies that payment as an independent expenditure.²¹ The
5 standard for determining if a communication by a public agency qualifies as an independent
6 expenditure is the same as the standard for the campaign related mailings sent at public expense
7 discussed above.²²

8 If a state or local governmental agency distributes communications that qualify as campaign
9 expenditures and cost \$1,000 or more in a calendar year, it qualifies as an independent expenditure
10 committee.²³ A committee must file a late independent expenditure report within 24 hours of making an
11 expenditure of \$1,000 or more during the 90 days prior to an election.²⁴ The report must include the
12 committee's name, committee's address, number or letter of the measure, jurisdiction of the measure,
13 amount, date, and description of goods or services for which the late independent expenditure was
14 made.²⁵ In addition to the 24-hour independent expenditure report, an independent expenditure
15 committee must also file a semi-annual campaign statement (Form 461), which includes some of the
16 information reported on the 24-hour independent expenditure report and additional information which
17 provides more transparency.²⁶ Requiring local government agencies to file campaign statements and
18 reports furthers the Act's purpose in disclosing expenditures made in election campaigns so that voters
19 are fully informed and improper practices are inhibited.²⁷

20 Section 82013.

21 Regulation 18420.1, subd. (a).

22 See Regulations 184201.1 and 18901.1.

23 Regulation 18420, subd. (d).

24 Sections 84200.6, subd. (b), and 84204.

25 Section 84204.

26 The reporting period for the semi-annual period for this expenditure would be July 1, 2018, through December 31,
27 2018. The semi-annual statement would be due on January 31, 2019.

27 Section 81002, subd. (a).

1 The letter started with “Dear Neighbor” and the signature at the end stated that Stiles was the City
2 Manager of Garden Grove. An examination of the City’s previous mailings to residents showed that
3 this mailing regarding Measure O was not consistent in style with past communications. Previous
4 mailings primarily quote the ballot measure’s language and contain a few photos of first responders and
5 city scenes. They maintained a neutral and informational tone. They did not include language urging
6 the public to vote for or against a particular candidate or ballot measure. The water bill insert mailing
7 regarding Measure O clearly departed from the City’s normal style and tone of communication.

8 The water bill insert also contained inflammatory and argumentative language, including the
9 following: “Garden Grove is an amazing city with an excellent quality of life. But unfortunately,
10 Sacramento politicians have taken millions from our City to solve their own problems – impacting our
11 ability to continue delivering high quality services over the long term. Furthermore, Sacramento’s
12 expensive mandates... have continually cost Garden Grove local funding. Finally, the State’s decision
13 to release prisoners and cut law enforcement has exacerbated homelessness and risked Garden Grove
14 residents and property. The Garden Grove City Council placed **Measure O** on the local ballot to
15 address these historic state takeaways and mandates and secure a reliable, locally-controlled funding
16 source.”; “People live in Garden Grove because we offer an excellent quality of life. However,
17 Sacramento politicians take millions of local tax dollars from our City...”; “The City council recently
18 voted to place **Measure O**.... on the November 6 ballot to address these state takeaways and protect
19 local services.”; “Measure O will provide a reliable source of locally-controlled funds to maintain the
20 services you rely on.”; “**Measure O** would provide funds to maintain 9-1-1 emergency response times
21 and prevent cuts to the number of police officers, firefighters, and paramedics.”; “**Measure O** would
22 provide locally-controlled funds to make sure Garden Grove can maintain public safety, repair roads
23 and streets, fix potholes, and keep neighborhood parks clean and safe.” Given the style, tenor, and
24 timing of this mailing, it is apparent that it unambiguously urged a vote in support of Measure O.

25 The City incurred \$1,526.80 in total costs paid out of the City’s General Fund to print and
26 distribute 32,000 copies of the mailing that unambiguously urged for passage of Measure O. The City
27 retained a printing and mail distribution company to handle these tasks. The mailing failed to display a
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1 proper advertisement disclosure statement. However, the mailing was clearly sent by the City, as it
2 prominently showed the City's name and logo, and the page with Stiles' letter identified Stiles as the
3 city manager. The City failed to timely report the expenditure on a 24-hour independent expenditure
4 report or semi-annual campaign statement (Form 461).

5 Measure O, if it passed, was estimated to raise \$19 million annually for the City. As previously
6 stated, the measure passed, and the sales tax increase was implemented in 2019.

8 VIOLATIONS

9 Count 1: Prohibited Campaign Related Mailing Sent at Public Expense (City and Stiles)³⁴

10 The City and Stiles caused to be sent 32,000 copies of an identical and prohibited campaign
11 related mass mailing at public expense at a total cost of \$1,526.80 which unambiguously urged the
12 passage of local tax Measure O, in violation of Section 89001 and the criteria set forth in Regulation
13 18901.1.

14 Count 2: Failure to Include Proper Disclosure on Campaign Advertisement (City)

15 The City failed to include a proper advertising disclosure on the campaign related mass mailing,
16 which was sent on or around November 1, 2018, in violation of Sections 84502 and 84504.2.

17 Count 3: Failure to Timely File 24-Hour Independent Expenditure Report (City)

18 The City failed to timely file a 24-hour independent expenditure report for the \$1,526.80
19 independent expenditure made on or around November 1, 2018, in violation of Section 84204,
20 subdivision (a).³⁵

21 Count 4: Failure to Timely File Semi-annual Campaign Statement (City)

22 The City failed to timely file a semi-annual campaign statement for the reporting period of July
23 1, 2018, to December 31, 2018, in violation of Section 84200, subdivision (b).³⁶

24 ³⁴ Stiles is only being charged under Count 1 of this stipulation because advertisement disclosures, filing 24-hour
25 independent expenditure reports and a semi-annual campaign statement would not be considered a responsibility of the city
manager to justify liability.

26 ³⁵ As part of the settlement, the City has also agreed to file a late independent expenditure report to accurately reflect
the expenditures made on the mailing.

27 ³⁶ As part of the settlement, the City has also agreed to file a semi-annual campaign statement to accurately reflect the
28 expenditures made on the mailing.

1 **PROPOSED PENALTY**

2 This matter consists of four proposed counts. The maximum penalty that may be imposed is
3 \$5,000 per count. Thus, the maximum penalty that may be imposed for the counts charged here is
4 \$20,000.³⁷

5 This matter does not qualify for the streamline program because it involves the use of public funds
6 for campaign related purposes, a violation which is not eligible for the streamline program. Regarding
7 the violations pertaining to the missing advertisement disclosures and the late filing of campaign
8 statements and reports, while those may be eligible under the streamline program on their own, since
9 they are tied to the violation involving the use of public funds, they are not eligible under the streamline
10 program.

11 In determining the appropriate penalty for a particular violation of the Act, the Commission
12 considers the facts of the case, the public harm involved, and the purpose of the Act. In particular, the
13 Commission considers the factors codified in Regulation Section 18361.5(e)(1)-(8): (1) The extent and
14 gravity of the public harm caused by the specific violation; (2) The level of experience of the violator
15 with the requirements of the Political Reform Act; (3) Penalties previously imposed by the Commission
16 in comparable cases; (4) The presence or absence of any intention to conceal, deceive or mislead; (5)
17 Whether the violation was deliberate, negligent or inadvertent; (6) Whether the violator demonstrated
18 good faith by consulting the Commission staff or any other governmental agency in a manner not
19 constituting complete defense under Government Code Section 83114(b); (7) Whether the violation was
20 isolated or part of a pattern and whether the violator has a prior record of violations of the Political
21 Reform Act or similar laws; and (8) Whether the violator, upon learning of a reporting violation,
22 voluntarily filed amendments to provide full disclosure.³⁸

23 Regarding the first factor, using public funds for a prohibited purpose carries a high degree of
24 public harm. The nature of the City’s violations of the Act is particularly concerning, as recognized by
25 the California Supreme Court in *Stanson v. Mott*, where the court stated “the use of the public treasury

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27 ³⁷ See Regulation 83116, subd. (c).

28 ³⁸ Regulation 18361.5, subd. (e)(1)-(8).

1 to mount an election campaign which attempts to influence the resolution of issues which our
2 Constitution leave to the ‘free election’ of the people [sic] does present a serious threat to the integrity of
3 the electoral process.³⁹ The use of public funds to support or oppose ballot measures is prohibited because
4 of the public harm of taxpayer funds being used to influence the voting public’s views on ballot measures.
5 Here, the City and Stiles advocated for the passage of a local measure using public funds. The very same
6 governmental entity that would benefit from the passage of Measure O used these funds to help in
7 strongly advocating for its passage. The city manager, as the financial steward of the City, used his
8 position of authority to help influence the voters. The City has continued to derive benefits from the
9 passage of Measure O. In fact, with a passage of 64.51% of the vote in favor of the tax measure, the water
10 bill insert’s unambiguous urging was likely an influencing factor at the expense of the public’s monies.
11 The Commission has expressed that in situations where the local entity continues to derive substantial
12 monetary benefit, the penalty should be significant to send a strong message. The Commission has also
13 directed Enforcement to charge individuals where appropriate. Given Stiles signed the letter sent to the
14 voters advocating for the passage of Measure O and given his position of authority and influence at the
15 time, it is appropriate to charge Stiles here.

16 The Act seeks to further protect the integrity of our electoral process by ensuring that voters know
17 who is responsible for the political advertisements that seek to influence how they cast their ballot, and
18 the voting public is harmed when that information is not included on campaign advertisements. In this
19 case, the public harm was caused by the advertisement failing to include any advertisement disclaimers..
20 In mitigation, the language of the water bill insert advertisement clearly identified the City as the sender
21 and Stiles as the city manager, and therefore avoided the harm that would result from a completely
22 anonymous advertisement.

23 The public harm inherent in campaign late-filing violations is that the public is deprived of
24 important, time-sensitive information regarding campaign activity, which is heightened when related to
25 preelection activity and 24-hour reporting. Here, the City’s failure to timely file a 24-hour independent
26 expenditure report prior to the November 6, 2018 Election, and failure to timely file the later semi-annual

27 ³⁹ *Stanson* at 218.

1 campaign statement, resulted in the public having limited knowledge of the City’s campaign activity
2 before and after the election, including the amount of money spent.

3 Regarding the second factor, neither the City nor Stiles were experienced with the Act. However,
4 the City at the time had legal assistance (via private legal counsel) available to consult with before
5 partaking in any campaign related actions, such as the ones leading to the violations herein. It is not clear
6 whether the City consulted with counsel or not.

7 Regarding the third factor, the Commission also considers the penalties in prior cases with
8 comparable violations. Furthermore, at the February 18, 2021, Commission Meeting, the Commission
9 directed the Enforcement Division to pursue penalties at or above 90 percent of the maximum penalty
10 when governmental agencies, like the City, engage in campaigning at public expense. Some recent
11 similar cases include the following:

12 *In the Matter of Mesa Water District*; FPPC No. 16/19813. (The Commission approved a
13 stipulated decision on May 21, 2020.) Mesa Water District placed Measure TT on the November 8, 2016,
14 General Election ballot. The District sent five prohibited mass mailings that unambiguously urged voters
15 to vote in favor of Measure TT. The District also paid for four newspaper advertisements in two local
16 newspapers to promote Measure TT. These campaign activities qualified the District as an independent
17 expenditure committee, but the District failed to include proper advertisement disclosure statements in
18 its newspaper advertisements. The District also failed to timely file eight 24-hour independent
19 expenditure reports and a semi-annual campaign statement to disclose to the public its campaign activities
20 totaling approximately \$42,151.40. The Commission approved a total penalty of \$14,500: \$5,000 for
21 sending prohibited campaign related mass mailings at public expense; \$3,500 for failing to include
22 advertisement disclosure statements; \$4,000 for failing to timely file 24-hour independent expenditure
23 reports; and \$2,000 for failing to timely file a semi-annual campaign statement.

24 *In the Matter of City of Fountain Valley*, FPPC No. 16/20109 (The Commission approved a
25 stipulated decision on March 18, 2021). Fountain Valley placed Measure HH on the November 8, 2016,
26 General Election ballot. Fountain Valley purchased advertisement space totaling \$1,600 to promote
27 Measure HH in a local magazine. The two magazine advertisements unambiguously urged a vote in favor
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1 of Measure HH. Fountain Valley also included a letter with every water bill mailed to its residents that
2 also unambiguously urged a vote in favor of Measure HH. The City paid a vendor \$150 to print and insert
3 15,000 copies of the letter with the water bill. Fountain Valley sent another letter unambiguously urging
4 a vote in favor of Measure HH to “community leaders,” who Fountain Valley identified as people,
5 including opponents, who were interested in the outcome of Measure HH. These campaign activities
6 qualified Fountain Valley as an independent expenditure committee, but Fountain Valley failed to include
7 proper advertisement disclosure statements in its magazine advertisements. Fountain Valley also failed
8 to timely file 24-hour independent expenditure reports and a semi-annual campaign statement to disclose
9 to the public its campaign activities totaling approximately \$1,780. The Commission approved a total
10 penalty of \$18,000 (\$4,500 per Count) for failing to include advertisement disclosure statements,
11 prohibited campaign related mass mailings by a public entity, failure to timely file a 24-hour independent
12 expenditure report, and failure to timely file a semi-annual campaign statement.

13 As in *Mesa* and *Fountain Valley*, the City here improperly used public funds to mount a campaign
14 in support of Measure O and distributed a mailing without proper advertisement disclosures and failed to
15 timely file campaign statements and reports. The Commission has expressed a strong desire for these
16 types of violations to be charged at or above 90% of the maximum penalty of \$5,000 per count. In
17 particular, and as noted above, the most recent case, *Fountain Valley*, resulted in a fine of \$4,500 for each
18 violation even though the total public monies spent was not at a high level as in *Mesa*. Herein, the costs
19 for the mailer were close to that in *Fountain Valley*, and a personal letter from the city manager was
20 included to further urge, which justifies a similar penalty.

21 In mitigation, and regarding the fourth factor, there was an absence of an intention to conceal,
22 deceive, or mislead. The mailer prominently included the City’s logo, and clearly identified Stiles as the
23 city manager. The Enforcement Division did not obtain any evidence that the violations were intentional
24 or deliberate (fifth factor) or part of any pattern.

25 Regarding the sixth factor, neither the Respondents or their counsel contacted the Commission
26 seeking advice pertaining to the regulations affecting public mailers and any required filings. There is no
27 prior record of any similar violations (seventh factor).

1 As part of the negotiated settlement, and in furtherance of satisfaction of the eighth factor, while
2 corrective statements were not filed when the Respondent learned of the violations, corrective campaign
3 reports and statements have been filed now to provide full disclosure. Additionally, the City and Stiles
4 were cooperative during the investigation and their intent was to resolve the matter expeditiously.

5 For the foregoing reasons and considering the seriousness of the violations, while considering the
6 mitigating factors, and the direction mandated by the Commission, a penalty of \$4,500 for Count 1
7 against the City and Stiles, a penalty of \$4,500 for Count 2 against the City, a penalty of \$4,500 for Count
8 3 against the City, and a penalty of \$4,500 for Count 4 against the City are recommended, for a total
9 penalty in the amount of \$18,000. This would represent a penalty of 90% of the maximum penalty of
10 \$20,000.

11 CONCLUSION

12 Complainant, the Enforcement Division of the Fair Political Practices Commission, and
13 Respondents the City and Stiles hereby agree as follows:

14 1. The City and Stiles, as indicated in the respective counts, violated the Act as described in
15 the foregoing pages, which are a true and accurate summary of the facts in this matter.

16 2. This stipulation will be submitted for consideration by the Fair Political Practices
17 Commission at the October 2023 meeting—or as soon thereafter as the matter may be heard.

18 3. This stipulation resolves all factual and legal issues raised in this matter—for the purpose
19 of reaching a final disposition without the necessity of holding an administrative hearing to determine
20 the liability of the City and Stiles pursuant to Section 83116.

21 4. The City and Stiles have consulted with their attorney, Omar Sandoval, and understand,
22 and hereby knowingly and voluntarily waive, all procedural rights set forth in Sections 83115.5, 11503,
23 11523, and Regulations 18361.1 through 18361.9. This includes but is not limited to the right to appear
24 personally at any administrative hearing held in this matter, to be represented by an attorney at the City's
25 and Stiles' own expense, to confront and cross-examine all witnesses testifying at the hearing, to
26 subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over
27 the hearing as a hearing officer, and to have the matter judicially reviewed. Additionally, the City and
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1 Stiles understand that they agreed to retain the same attorney, Omar Sandoval, for the purposes of
2 settlement of this matter.

3 5. The City and Stiles agree to the issuance of the decision and order set forth below. Also,
4 the City and Stiles agrees to the Commission imposing against them an administrative penalty in the
5 amount of \$18,000. A cashier's check or money orders totaling said amount—to be paid to the General
6 Fund of the State of California—is/are submitted with this stipulation as full payment of the
7 administrative penalty described above, and same shall be held by the State of California until the
8 Commission issues its decision and order regarding the matter. In addition, as part of the settlement, the
9 City agrees to file all necessary statements and reports as mandated by law to provide full disclosure of
10 the activities.

11 6. If the Commission declines to approve this stipulation—then this stipulation shall become
12 null and void, and within fifteen business days after the Commission meeting at which the stipulation is
13 rejected, all payments tendered by the City and Stiles in connection with this stipulation shall be
14 reimbursed to the City and Stiles. If this stipulation is not approved by the Commission, and if a full
15 evidentiary hearing before the Commission becomes necessary, neither any member of the Commission,
16 nor the Executive Director, shall be disqualified because of prior consideration of this Stipulation.

17 7. The parties to this agreement may execute their respective signature pages separately. A
18 copy of any party's executed signature page including a hardcopy of a signature page transmitted via fax
19 or as a PDF email attachment is as effective and binding as the original.

20 Dated: _____
21 _____
22 James M. Lindsay, Chief of Enforcement
23 Fair Political Practices Commission

24 Dated: _____
25 _____
26 Lisa Kim, on behalf of City of Garden Grove

27 Dated: _____
28 _____
Scott Stiles

1 The foregoing stipulation of the parties “In the Matter of City of Garden Grove and Scott Stiles,” FPPC
2 No. 18-1357, is hereby accepted as the final decision and order of the Fair Political Practices
3 Commission, effective upon execution below by the Chair.

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5 IT IS SO ORDERED.

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7 Dated: _____

_____ Richard C. Miadich, Chair
8 Fair Political Practices Commission
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