



ANNUAL REPORT

FAIR POLITICAL PRACTICES COMMISSION

2025

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E. Dotson Wilson
Commissioner

Charlene Zettel
Commissioner

Adam E. Silver
Chair

Alf W. Brandt
Commissioner

Elsa Ortiz
Commissioner

ABOUT THE FPPC

The Fair Political Practices Commission is a five-member independent, nonpartisan commission that has the primary responsibility for the impartial and effective administration and enforcement of the Political Reform Act. The Act regulates campaign finance, conflicts of interest, lobbying, and governmental ethics. The Commission's objectives are to ensure that public officials act in a fair and unbiased manner in the governmental decision-making process, to promote transparency in government, and to foster public trust in the political system.

The Act and the FPPC were created in 1974 when California voters approved

Proposition 9. Since the adoption of the Act, the Commission has worked to promote and increase transparency, provide assistance, advice, and education to thousands of individuals in the regulated community, and effectively enforce the Act.

2025 MEMBERSHIP OF THE COMMISSION

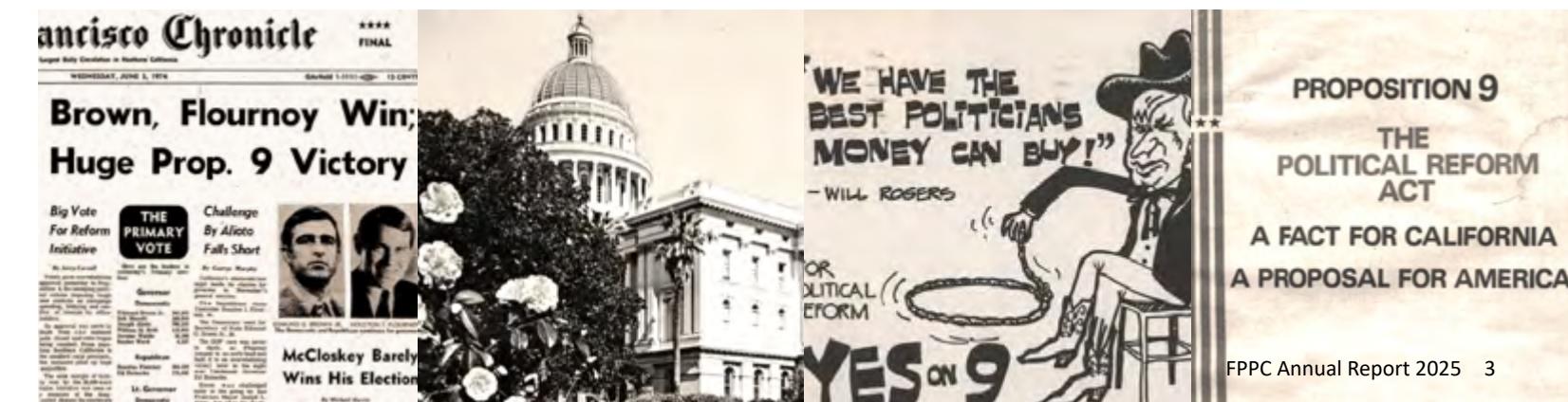
Adam E. Silver, Chair

Elsa Ortiz

E. Dotson Wilson

Alf W. Brandt

Charlene Zettel, Vice-Chair





MESSAGE FROM FPPC CHAIR ADAM E. SILVER

As Chair of the Fair Political Practices Commission, I am proud to share the Commission's accomplishments in 2025 and the progress we have made in advancing integrity, transparency, and fairness in California's political process. This year marked a period of meaningful reform, rigorous enforcement, and focused action to regulate and responsibly deploy emerging technologies. Simply put, the Commission delivered in 2025.

The Commission delivered on enforcement: Despite opening more than 1,300 new cases, the Enforcement Division reduced its caseload in 2025 to among the lowest levels seen this decade - representing a 40% drop from 3 years ago. It also successfully prosecuted over 878 cases and levied \$543,539 in fines - the highest total for any off-election year so far this

decade. These prosecutions included major cases involving campaign money laundering, mass mailing at the public expense, conflicts of interest, and other serious violations of the state's ethics and campaign finance rules.

The Commission delivered on policy: Six Commission-sponsored bills were signed into law in 2025 - a high-water mark for the Commission. More important than the number, however, is the significant impact these measures will have on transparency, compliance, and public trust for decades to come. Notably, AB 953 strengthens safeguards against foreign influence in ballot-measure campaigns; AB 1029 brings digital financial assets squarely within California's disclosure and conflict-of-interest framework; AB 1286 requires that high level public officials disclose any employment they arranged for while in

office; and SB 852 expands prohibitions on campaign fundraising in public buildings. These reforms reflect a shared commitment to transparency, accountability, and public confidence.

The Commission delivered when it mattered most: As a former Los Angeleno, I am proud to say that in the wake of the LA wildfires, the Commission moved swiftly to provide public officials in LA County with the support and resources needed to prioritize their community while remaining in compliance with the Political Reform Act.

The Commission delivered on regulating and adopting emerging technology: The Commission adopted new regulations governing Third-Party Processors used by campaigns, requiring stronger verification measures to prevent illegal contributions, including address verification, restrictions on prepaid cards, and identification of foreign IP activity. We also convened a public panel on detecting artificial intelligence in campaign advertising, bringing together experts to examine both the risks and regulatory challenges

posed by rapidly advancing technology. Moreover, the FPPC initiated the development of AI-powered tools to improve operational efficiency, enhance public guidance, and strengthen enforcement.

Last, but certainly not least, we welcomed two new Commissioners: Alf W. Brandt and Charlene Zettel. Their experience, judgment, and commitment to public service strengthen the FPPC as we confront emerging challenges and continue to safeguard transparency and accountability in California government.

As we look ahead to 2026, the Commission remains steadfast in its mission to uphold ethical standards and ensure Californians can trust the integrity of their political system. I am grateful to my fellow Commissioners, our dedicated staff, and our partners across state government for their continued commitment to that mission.

Adam E. Silver
Chair
Fair Political Practices Commission

2025 YEAR IN REVIEW

EDUCATION AND TRAINING

Political Reform Consultants in the Legal Division prepare and conduct extensive training and outreach through workshops, webinars, video tutorials, and other training materials to help individuals better understand their obligations under the Political Reform Act. The division also develops the forms and manuals used for financial disclosures and provides telephone advice for filers, their staff, and filing officers throughout the state.

52 trainings conducted.

5,368 total views of FPPC video tutorials:

885 were of Candidate & Treasurer tutorials,

3,645 were of Form 700 tutorials,

838 were of Filing Officer tutorials.

4,758 telephone calls providing technical assistance.



POLITICAL REFORM EDUCATION PROGRAM (PREP)

PREP is an educational program that allows individuals who commit minor violations of the Political Reform Act and who have little to no experience with the Act to take an educational course in lieu of monetary penalties.

266 individuals successfully completed PREP courses in 2025.



LEGAL ADVICE

The Legal Division responds to a large number of requests for advice from state and local officials, candidates, campaign committees, and lobbyists. For relatively straightforward inquiries, staff attorneys and Political Reform Consultants provide informal advice by phone or email. For some requests, legal staff can provide written advice in the form of advice letters, which are publicly available on the FPPC website.

6,246 emails providing advice on compliance with the Act.

169 advice letters researched and authored, **58** of which related to Section 1090 of the Government Code.



ENFORCEMENT CASES

The Enforcement Division analyzes and processes complaints and referrals about potential violations of the Political Reform Act and investigates if there is sufficient information to believe that a violation of the Act has occurred. A complaint can be resolved through a letter finding no violation, an advisory letter, a warning letter, or through prosecution, which may result in monetary penalties approved by the Commission.

1,268 cases resolved, with **93** settlements, **3** defaults, and **\$543,539** in total fines.



FORM 700S

The Administration Division processes and acts as filing officer for Statements of Economic Interests from all levels of government across the state.

26,512 annual, assuming office, leaving office, and candidate statements filed with the Commission through the FPPC's electronic filing system.



AUDIT REPORTS

The Audits and Assistance Division operates the audit program of both mandatory and discretionary audits.

8 audit reports were adopted by the Audits and Assistance Division in 2025. These included reports for candidates and committees controlled by candidates for City of San Bernardino, San Bernardino County, CalPERS, and Statewide offices with **\$516,695** in total combined funds received and **\$506,244** in total combined expenditures made.



CONFLICT OF INTEREST CODES

Political Reform Consultants in the Legal Division prepare recommendations to Commission Counsel for conflict of interest code adoptions and amendments for all state and multi-county agencies. Political Reform Consultants also conduct webinars and create training materials for government agencies developing their conflict of interest codes.

122 state agency and multi-county agency conflict of interest codes approved.

2025 HIGHLIGHTS AND UPDATES

2025 produced many accomplishments for the FPPC, with successes in legislation, enforcement, education, as well as the addition of new Commissioners. Here are some of the highlights:

FPPC LEGISLATION MAKES NEWS

Before each legislative session, the FPPC compiles a strong package of legislative proposals to enhance the Political Reform Act.

As the 2025-2026 session began, Sacramento-based Capitol Public Radio highlighted the FPPC's 2025 legislative package. Chair Adam E. Silver highlighted his overarching goal of increasing public trust while outlining various bills to strengthen campaign finance reporting laws, behested payment reporting, and bans on contributions in public buildings.

 [California political watchdog pushes bills to strengthen financial reporting laws](#)



Statewide media outlet CalMatters highlighted one of the FPPC's bills approved by the Legislature and signed by Governor Gavin Newsom. AB 1286 (Assembly-member Tasha Boerner, D-Solana Beach) requires California's elected officials and state appointees to disclose when they've received a new job while still in office, before their term ends. An earlier story by CalMatters about the issue prompted Chair Silver to include the proposal in the FPPC legislative package, calling it "an important step forward for transparency and accountability in the political process."

 [After CalMatters report, Newsom signs law forcing lawmakers to disclose their new jobs](#)

THE CHAIR IN THE MEDIA

In August, Chair Adam E. Silver was the featured guest on "The Maddy Report", a monthly public affairs program hosted by Maddy Institute Executive Director Blake Zante.

Besides providing the background, history, and mission of the FPPC and Political Reform Act, Zante and Chair Silver covered a wide range of topics, such as campaign spending, technology, dark money, social media, legislation, and hope the public can participate in the process. Looking ahead, the two also discussed the impacts and potential of Artificial Intelligence, how it may be able to help in Enforcement as well as Education of the law.

The Institute is a non-partisan, non-profit public policy institute for the San Joaquin Valley, and is a partnership between the Valley's four public universities; California State University, Bakersfield, California State University, Fresno, California State University, Stanislaus, and University of California, Merced.

 [The Maddy Report: California's Fair Political Practice Commission](#)



Capitol Weekly Editor-in-Chief Rich Eisen and Executive Director Tim Foster hosted Chair Silver for the weekly podcast for the publication which covers California politics and government.

After charting Chair Silver's background from Executive Fellow to being FPPC Chair, the podcast again covered the history and role of the FPPC, some of the current challenges and issues facing the Commission and the Political Reform Act, as well as potential laws, regulations, and other remedies covering the ever-changing landscape of campaign finance, technology, cryptocurrency, and Artificial Intelligence.

 [A chat with Adam Silver, Chair of the California FPPC](#)

(For a full list of legislation, regulations, and major enforcement actions, see [Appendices A, B, & C](#). for 2025 data on education, advice, and total enforcement actions, see [the 2025 year in review](#))

NEW COMMISSIONERS AND APPOINTMENTS

2025 saw the addition of two new Commissioners:



Alf W. Brandt joined the FPPC in February, appointed by Secretary of State Dr. Shirley Weber. Commissioner Brandt currently serves as Associate Director, Justice Solutions & Innovation, at the National Judicial College, where he organizes judicial education programs on a wide range of topics and created new programs about election law and judicial independence. Commissioner Brandt earned his Bachelor of Arts in Political Science from the University of California, Los Angeles and his Juris Doctor from the University of California, Berkeley (Boalt Hall).



Charlene Zettel joined the FPPC in August, appointed by State Controller Malia M. Cohen. Commissioner Zettel made history as the first Republican Latina elected to the State Assembly, representing the 75th District from 1998-2002. Commissioner Zettel also led the California Department of Consumer Affairs and served as a University of California Regent.

In 2025, the Commission made the following appointments within the agency:



The Commission appointed **Kendall L.D. Bonebrake** as its new Chief of Enforcement. Prior to the FPPC, Bonebrake served as Assistant Chief Counsel at the California High-Speed Rail Authority. Chief Bonebrake earned her Juris Doctor from the University of California, Davis School of Law and holds a Bachelor of Science in Business Marketing from California State University, Fresno.



Chair Silver on COGEL panel

COUNCIL ON GOVERNMENTAL ETHICS LAWS (COGEL) ANNUAL CONFERENCE



Left to Right, Patrick Llewellyn, Director, State Campaign Finance, Campaign Legal Center; Cathryn Motherwell, Integrity Commissioner, Province of Ontario, Canada; Georgia Governor Brian Kemp; FPPC Executive Director/outgoing COGEL President Galena West; Daniel Cho, Assistant Executive Director for Campaign Affairs, New York City Campaign Finance Board



Chair Silver on COGEL panel

Chair Adam Silver - Using AI and Tech Tools to Improve Your Office and Compliance...

Chair Silver and panelists discussed how AI and tech tools are transforming how ethics and oversight offices operate, highlighting innovative ways agencies are leveraging technology to boost efficiency, strengthen compliance, and modernize public service. Panelists featured what tools are working and how to implement them responsibly.

Chair Adam Silver - Lobbyist Gifts: Implications, Considerations and Challenges...

Chair Silver and panelists discussed how lobbyists gifts are disclosed and regulated as well as looking into issues such as valuation and behested payments.



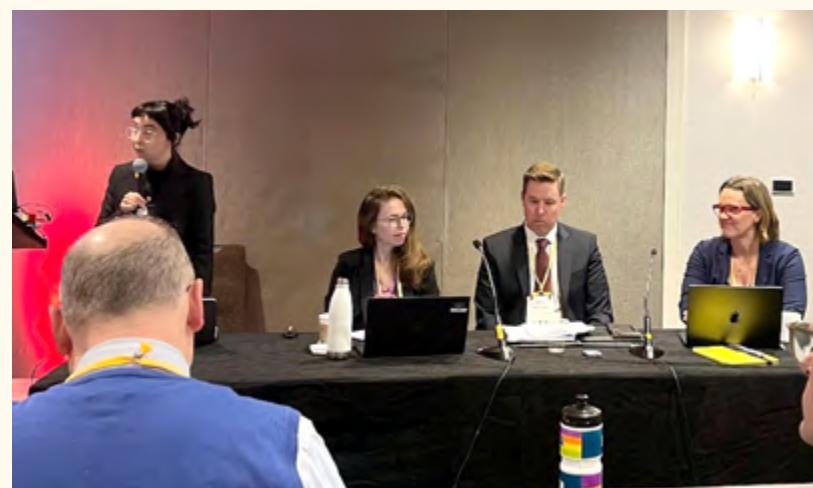
In December 2025, representatives from the FPPC attended the 47th annual conference of the Council on Governmental Ethics Laws in Atlanta, Georgia. COGEL is a professional organization for government agencies and other organizations working in ethics, elections, freedom of information, lobbying, and campaign finance. The FPPC regularly participates in the annual conference in a planning capacity, by participating in panels to share perspective and expertise, and by attending panels to grow agency knowledge and gain inspiration for forward change.



Executive Director West serves on the COGEL board of directors as Past President, with her term as President ending in December of 2025.



Executive Director Galena West



FPPC General Counsel Bainbridge on COGEL panel, with former Commissioner Abby Wood. FPPC Senior Legislative Counsel Nakano moderating

Executive Director Galena West

- New Kid on the Block: How to Help New Leadership and Board members help you...

Executive Director West and others shared tips and best practices on how to create successful outcomes when new leadership and/or members come on board, bringing them up to speed, and promoting a collegial culture and environment.

Executive Director Galena West - Mission Control: Agency Leaders Roundtable, Unplugged and Unfiltered...

Executive Director West and leaders of three fellow agencies discussed the pressures, challenges, dynamics, and best practices for running a government agency. This included frank discussions on budgets, technology, political pressure, maintaining public trust, and limited resources.



Other FPPC staff, including General Counsel Dave Bainbridge, Assistant Chief of Enforcement Christopher Burton, Senior Legislative Counsel Lindsey Nakano, Supervisory Special Investigator Lance Hachigian, Supervisory Special Investigator Jeffrey Kamigaki, Education and External Affairs Manager Chloe Hackert, and Prep and Special Projects Unit Manager Dominika Wojenska also participated on panels, sharing their knowledge and experience relating to advice and enforcement issues, free speech and misinformation, and ethics accountability.



FPPC Supervisory Special Investigator Hachigian on COGEL panel, FPPC Education and External Affairs Manager Chloe Hackert moderating



FPPC Assistant Chief of Enforcement Chris Burton on COGEL panel



FPPC Senior Legislative Counsel Lindsey Nakano moderating COGEL panel

FPPC AT THE CA POLITICAL TREASURERS ASSOCIATION

FPPC Audits and Assistance Division Chief Shrdha Shah spoke at the CPTA (CA Political Treasurers Association) meeting on Nov 14, 2025 in Sacramento. The audience included political treasurers from across the state. Chief Shah talked about how audits are structured, the FPPC audit process and common findings we've noted over the years, and included Q&A. Also speaking were FPPC Legislative Counsel Lindsey Nakano and Enforcement Counsel Erika Boyd.

FPPC SPEAKING ENGAGEMENTS

FPPC staff are considered experts on the Political Reform Act and its provisions. Because of such expertise, we are often asked to speak to various groups about our work. Here are some examples:

In May, Supervising Special Investigator Lance Hachigian and Commission Counsel Simon Russell gave a presentation on conflicts of interest to the California District Attorney's Association in San Diego.

In July, Supervising Special Investigators Jeffrey Kamigaki and Lance Hachigian

provided the Council on Governmental Ethics Laws (COGEL) a presentation called "Making the Case," outlining the initial steps in opening and conducting investigations.

In August, Supervising Special Investigators Jeffrey Kamigaki and Lance Hachigian gave the Council on Governmental Ethics Laws (COGEL) a presentation covering best practices for writing clear and effective investigative reports called "Make it Make Sense: Effective Report Writing."



LEGISLATION HIGHLIGHTS

AB 953 (Pacheco and Alanis) - Preventing Foreign Interference in California Elections

AB 953 strengthens protections against foreign interference in state and local elections. Prior to AB 953, there was no prohibition on foreign nationals making monetary contributions or expenditures to support or oppose ballot measures in California. AB 953 closes this gap in state law to prohibit a foreign national from making a contribution, expenditure, or independent expenditure in connection with a state or local ballot measure, consistent with state and federal law that prohibits foreign nationals from making contributions or expenditures in connection with candidates. The bill makes an exemption to this prohibition for a person granted deferred action under the federal Deferred Action for Childhood Arrivals (DACA) program.

AB 1029 (Valencia) - Disclosure of Digital Financial Assets (Cryptocurrency)

AB 1029 updates the financial disclosure requirements to keep pace with changing technology and practices. Under AB 1029, commencing January 1, 2027, digital financial assets will be subject to disclosure on the Statement of Economic Interests (Form 700) in the same manner as other types of investments,

and could give rise to a conflict of interest if it were reasonably foreseeable that a government decision would have a material financial effect on the digital financial asset.

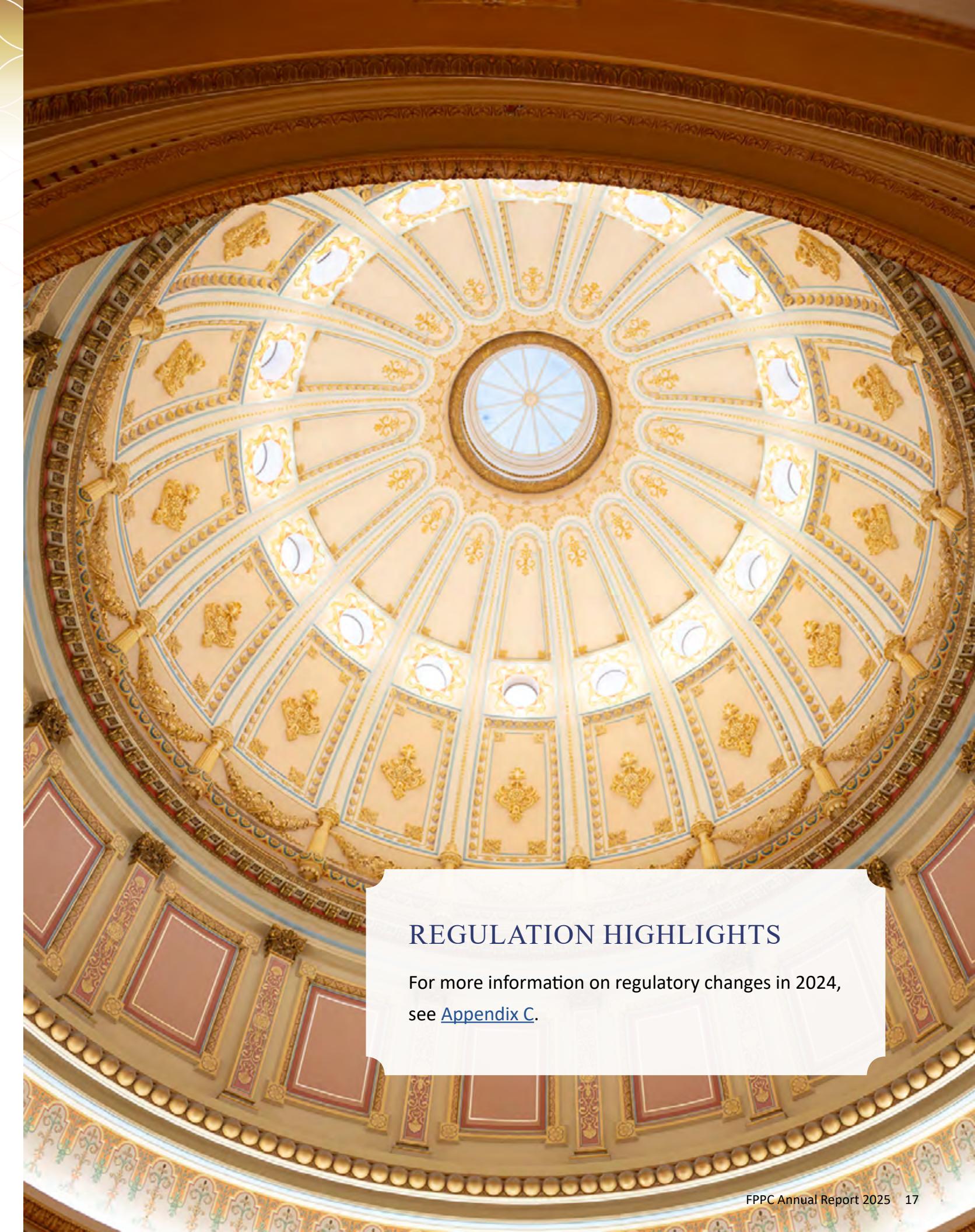
AB 1286 (Boerner) - Disclosure of Prospective Employment

AB 1286 enhances transparency and accountability by requiring certain public officials to disclose when they have accepted a job offer. AB 1286 requires the Statement of Economic Interests (Form 700) filers listed in Section 87200 to disclose arrangements for prospective employment on their Form 700s if the filer has accepted an offer of employment from the employer.

SB 852 (Senate Elections and Constitutional Amendments Committee) - Expansion of Prohibition on Making Contributions in Government Offices and Buildings.

SB 852 strengthens law that aims to prevent corruption or the appearance of corruption. SB 852, in part, expands the existing prohibition on delivering or receiving contributions in state offices and office buildings to also apply to local government offices and office buildings, as well as legislative district offices.

For more information on legislative changes in 2025, see [Appendix B](#).



REGULATION HIGHLIGHTS

For more information on regulatory changes in 2024, see [Appendix C](#).

DIVISION UPDATES AND HIGHLIGHTS

AUDITS AND ASSISTANCE DIVISION

The FPPC Audits & Assistance Division conducts both mandatory and discretionary audits in accordance with the Political Reform Act. In 2025, the Division strengthened its team through the recruitment of a new Senior Management Auditor. During the year, the Audits & Assistance Division adopted 8 campaign audit reports, reflecting continued progress in fulfilling its statutory responsibilities.

In addition to conducting campaign audits, Division auditors contributed their subject matter expertise to the FPPC's Enforcement Division by assisting with investigation cases. The team demonstrated a comprehensive understanding of campaign laws and regulations, collaborating closely with the Legal Division on proposed regulations and delivering agency-wide training sessions for staff, including a training on how to fill out the California Campaign Form 460.

Throughout the year, the Audits & Assistance Division conducted three public draws to select entities subject to audit, encompassing statewide offices, legislative districts, lobbying

firms, lobbyist employers, local jurisdictions, superior court offices, and general-purpose committees. Collaboration also extended beyond the Commission, as auditors worked with the Franchise Tax Board's Political Reform Audit Division to discuss regulatory and statutory changes and to provide input on ongoing audits. Additionally, the Division offered advisory support to various ethics commissions by responding to specific audit-related inquiries and providing general audit guidance upon request.

ADMINISTRATION AND TECHNOLOGY DIVISION

The FPPC expects to launch its new, upgraded website in the early part of 2026. The IT unit has been working on this project for the latter part of 2025. This website upgrade project includes extensive feedback from the public as well as from FPPC staff. Along with a new user experience, the new website will feature a more advanced search function to help visitors more easily navigate and find what they are looking for. The new website will also feature better maintenance windows, increased redundancy, enhanced security, and improved uptime.

Besides the website upgrade, the FPPC IT team is also actively researching the best way to safely implement Artificial Intelligence to help staff serve the people of California. The FPPC IT unit enhanced its security capabilities by expanding monitoring and reporting tools to minimize downtime and service outages while simplifying administration. Additionally, the unit identified

legacy systems and is working to modernize several commission tasks, improving efficiency and service delivery. These system updates are in various stages of development and implementation and aim to benefit both commission staff and the public. The IT unit remains focused on improving staff and public services, increasing operational efficiency, and reducing the organization's environmental impact. Ongoing efforts include researching emerging technologies, enhancing communication and transparency with the public, and supporting all FPPC services.

The Statements of Economic Interests (SEI) Unit within the Administration and Technology Division provides technical assistance to public officials across California who are required to file the Statement of Economic Interests (Form 700). With a team of six, the SEI Unit acts as the filing officer for approximately 26,000 high-level officials, including elected officials, candidates, judges, and heads of state departments and agencies. Starting January 1, 2025, public officials for whom the FPPC serves as the filing officer must submit their Form 700 using the Commission's electronic filing system. This platform allows filers to complete their Form 700 securely and conveniently online at any time. The SEI unit has been actively working on system enhancement to strengthen compliance and improve user-friendliness, guided by feedback received from the public. Additionally, with the passage of SB 852, effective January 1, 2026, those public officials who manage public investments are required to file their statements

of economic interest using the Commission's electronic filing system. The SEI Unit is working diligently to support a seamless transition for all new filers to the FPPC's e-filing system and will continue to provide technical assistance by phone and email to help ensure all filing requirements are met effectively and efficiently.

The Admin Division manages essential personnel functions, including recruitment, hiring, position classifications and reclassifications, attendance and payroll, training, equal employment opportunity, labor relations, and reasonable accommodations. Throughout the year, the Division focused on updating HR policies and procedures, actively developing consistent standards to better support the Commission. Budgeting responsibilities include developing the Commission's budget, monitoring expenditures, and managing all revenue. The Division continues to advance enforcement collections through sustained effort. Business services encompass building and space management, communications, contracts and procurement, equipment and supply management, maintenance, and travel. The Division successfully achieved compliance with Small Business (SB) and Disabled Veteran Business Enterprise (DVBE) requirements during the past fiscal year. The Division also leads reporting efforts and programmatic activities under the State Leadership Accountability Act (SLAA), which includes establishing and maintaining a robust system of internal controls within the Commission.

ENFORCEMENT DIVISION

2025 was another busy and productive year for the Enforcement Division and the Enforcement Division was able to achieve significant success in the continued efforts to reduce active Enforcement cases and increase processing efficiency.

The Intake Unit is responsible for receiving, assessing and processing complaints from the public and referrals from filing officers to the Enforcement Division. In 2025, the Intake Unit received 910 complaints - significantly more than any recent non-election year. In 2025, the Intake Unit also received 1,518 filing officer referrals, nearly a 10% increase from 2024. The Intake Unit was also highly successful in its efforts to reduce its backlog of referrals and successfully processed nearly every SEI and Campaign referral received prior to 2024. Overall, the Enforcement Division opened 1,302 new cases in 2025, continuing 2024's success in efficiently reviewing complaints and promptly opening cases when appropriate.

The Investigations Unit and Prosecutions Unit are primarily responsible for the investigation, review and proper handling of most cases that are opened in the Enforcement Division. Although 1,302 cases were opened as stated above, 1,268 cases were closed in 2025, representing the excellent work of the Enforcement Division staff in ensuring that open cases were processed and resolved efficiently and expeditiously.

In 2025, monetary penalties totaled over a half million dollars, representing almost 100 settlement agreements.

By the end of 2025, the Enforcement Division had significantly reduced its oldest caseload and continued to maintain the number of open cases under 900. Of the Enforcement Division's open cases, almost half were opened in 2025.

The Division is proud of its efforts in 2025 and looks forward to another great year in 2026.

LEGAL DIVISION

The Legal Division's Political Reform Education Program (PREP), which offers online educational courses in lieu of fines for minor violations of the Act, now has four courses available with plans to roll out additional courses in the coming year. In 2025, PREP achieved **266** course completions, its highest number since the program's launch in 2022.

The Legal Division also updated the advertising disclosure charts and several fact sheets covering topics such as gifts and travel, inauguration events, local contribution limits, reporting behested payments made in response to a crisis, county central committees, and more. Lastly, the Legal Division assisted with the statewide special election by preparing the filing schedule for Proposition 50 and a fact sheet about the special election.

APPENDIX A

MAJOR ENFORCEMENT CASES

LAUNDERED CAMPAIGN CONTRIBUTIONS

In the Matter of Ryan Ogulnick; AC 2525 Main, LLC; RHW Holdings, LLC; Beverly Grossman Palmer; and the PAC known as "Californians for Ethical Patient Care, Yes on Tinajero for Mayor and Sarmiento and Reyna for City Council; No on Bacerra for City Council, Santa Ana 2018, Sponsored by 19th Green OC, LLC,"; FPPC No. 18/1194.

Staff: Neal Bucknell, Senior Commission Counsel and George Aradi, Special Investigator. Palmer and the PAC are represented by Amber Maltbie of Nossaman LLP. Ogulnick and the LLC respondents are represented by Gary Winuk of Kaufman Legal Group. Ryan Ogulnick is an Orange County developer and part-owner of the LLC respondents, which are both development companies. Beverly Grossman Palmer is a campaign attorney and partner with the law firm of Strumwasser & Woucher, LLP. Palmer served as the PAC's treasurer. In this matter, at the request/direction of Ogulnick, the LLC respondents made three contributions to the

PAC (totaling \$320,000) in the name of another company—in violation of Government Code Section 84301 (3 counts). Also, Ogulnick, the LLC respondents, and the PAC caused misleading and inaccurate reporting on a 24-Hour Report regarding the true sources of contributions to the PAC (totaling \$170,000), in violation of Government Code Section 84203 (1 count).

With respect to a semi-annual statement that was filed for the period ending December 31, 2018, Ogulnick, Palmer, the PAC, and both LLC respondents failed to comply with various campaign reporting requirements, in violation of Government Code Sections 84211, subdivisions (f), (k); and 84303 (1 count). Palmer and the PAC failed to file required 24-Hour Reports with respect to the PAC's advertisements—in violation of Government Code Section 84204 (3 counts). Additionally, Ogulnick, the PAC, and the LLC respondents provided misleading and inaccurate top contributor disclosures for PAC advertisements (during the last week leading up to the election), in violation of Government Code Sections 84503, 84504.1 and 84504.3 (1 count). **Total Proposed Penalty \$87,000.**

BEHESTED PAYMENTS

In the Matter of Evan Low and Evan Low for Assembly 2020; FPPC Nos. 20/231 & 23/443.

Staff: Jenna C. Rinehart, Senior Commission Counsel, and George Aradi, Special Investigator. The Respondents are represented by Amber Maltbie of Nossaman LLP. Low was first elected to State Assembly in 2014 and left office on

December 1, 2024. Low was a successful candidate for State Assembly in the March 3, 2020 and the November 3, 2020 elections. Evan Low for Assembly 2020 was Low's candidate-controlled committee. Low failed to timely file behested payment reports, in violation of Government Code Section 84224 (3 counts), and failed to verify campaign statements, in violation of Government Code Section 81004 (7 counts). The Committee and Low failed to timely disclose accrued expenses, in violation of Government Code Section 84211 and Regulation 18421.6 (7 counts), and failed to timely



disclose subvendor payments, in violation of Government Code Sections 84303 and 84211 (4 counts). Additionally, the Committee and Low failed to maintain campaign records, in violation of Government Code Section 84104 (1 count), and failed to properly terminate the Committee, in violation of Government Code Section 84214 and Regulation 18404 (1 count).

Total Proposed Penalty: \$106,000.

CAMPAIGN CONTRIBUTION LIMITS

In the Matter of Vicky Santana, Santana for Senate 2018, and David Gould; FPPC No. 20/614.

Staff: Neal Bucknell, Senior Commission Counsel; Lance Hachigian, Supervising Special Investigator; Ann Flaherty, Special Investigator; and Kaitlin Osborn, Special Investigator. Gould is represented by Leilani Beaver of Beaver Legal Corporation. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Santana was an unsuccessful candidate for California State Senate, District 32, in the June 5, 2018 Primary Election. Santana for Senate 2018 was Santana's candidate-controlled committee. Gould was the Committee's treasurer. The Committee, Santana, and Gould accepted over-the-limit campaign contributions (and caused Santana's parents to make over-the-limit campaign contributions) in violation of Government Code Sections 83124 and 85301, and Regulation 18545, subdivision (a)(1) (1 count); reported inaccurate information on a 24-Hour Report, which concealed the true source of campaign funds, in violation of Government Code Section 84203 (1 count); and caused Santana's parents to make a campaign contribution in the name of another, in violation of Government Code Section 84301 (1 count).

Total Proposed Penalty \$15,000.

MISUSE OF CAMPAIGN FUNDS

In the Matter of Fernando Armenta and Noemi Armenta; FPPC No. 19/996.

Staff: Bridgette Castillo, Senior Commission Counsel and Lance Hachigian, Special Investigator. Fernando Armenta was an unsuccessful candidate for Monterey County Board of Supervisors in the June 7, 2016 Primary Election. Fernando Armenta was a member of the Monterey County Board of Supervisors from 2000 until the end of 2016. Fernando Armenta for County Supervisor was Fernando Armenta's candidate-controlled committee. Noemi Armenta served as the Committee's treasurer. From August 2016 through July 2018, Fernando Armenta and Noemi Armenta misused committee campaign funds by making payments that were unrelated to a political, legislative, or governmental purpose, in violation of Government Code Sections 89510, subdivision (b); 89512; 89513; and 89517 (5 Counts). **Total Proposed Penalty: \$25,000.**

CONFLICT OF INTERESTS

In the Matter of Miguel Pulido; FPPC No. 19/531.

Staff: Neal Bucknell, Senior Commission Counsel and Paul Rasey, Special Investigator. Miguel Pulido was the Mayor of Santa Ana. Pulido received personal loans, which were not in writing, from three different lenders, in violation of Section 87461 (2 counts).

Total Proposed Penalty: \$6,500.

MASS MAILING AT PUBLIC EXPENSE

In the Matter of Cathedral City; FPPC No. 21/156.

Staff: Alex Rose, Senior Commission Counsel and Jay Gehres, Special Investigator. The Respondent was represented by Eric S. Vail of Burke, Williams, & Sorensen. Cathedral City sent prohibited campaign-related mass mailings at public expense, in violation of Government Code Section 89001 and Regulation 18901.1 (2 counts); failed to include the proper advertising disclosure on mailers, in violation of Government Code Sections 84502 and 84504.2 (2 counts); failed to timely file an independent expenditure committee campaign statement for the period of January 1, 2021 to June 30, 2021, in violation of Government Code Section 84200, subdivision (b) (1 count); and failed to timely file two 24-Hour Reports, in violation of Government Code Section 84204 (2 counts).

Total Proposed Penalty: \$31,500.

In the Matter of City of Hanford; FPPC No. 22/564.

Staff: Alex Rose, Senior Commission Counsel and Alethea Perez, Special Investigator. The respondent was represented by Ty Mizote of Griswold LaSalle. The City of Hanford sent prohibited campaign-related mass mailings at public expense, in violation of Government Code Section 89001 and Regulation 18901.1 (1 count); failed to include the proper advertising disclosure on mailers, in violation of Government

Code Sections 84502 and 84504.2 (1 count); failed to timely file an independent expenditure committee campaign statement for the period ending June 30, 2022, in violation of Government Code Section 84200, subdivision (b) (1 count); and failed to timely file one 24-Hour Report, in violation of Government Code Section 84204 (1 count).

Total Proposed Penalty: \$18,000.

In the Matter of Oceanside Unified School District; FPPC No. 24/1211.

Staff: Alex Rose, Senior Commission Counsel and Victoria Cichy, Special Investigator. Oceanside Unified School District (“OUSD”) is represented by Jonathan Salt of F3 Law. OUSD is a public school district based in San Diego County. OUSD sent a two-sided newsletter to every resident of Oceanside that featured each of the eight OUSD Board of Trustees members. Thus, OUSD sent a prohibited mass mailing at public expense, in violation of Government Code Sections 89001 and 89002 (1 count).

Total Proposed Penalty: \$4,000.

ADVERTISEMENTS

In the Matter of County of San Benito; FPPC No. 23/006.

Staff: Alex Rose, Senior Commission Counsel and Kristin Hamilton, Special Investigator. The County of San Benito is represented by Gregory Priamos of Prentice | Long, PC. The County of San Benito sent prohibited campaign-related

mass mailings at public expense, in violation of Government Code Section 89001 and Regulation 18901.1 (1 count), failed to include the proper advertising disclosure on mailers, in violation of Government Code Sections 84502 and 84504.2 (1 count), failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200, subdivision (b) (1 count), and failed to timely file one 24-Hour Report, in violation of Government Code Section 84204 (1 count). **Total Proposed Penalty: \$18,000.**

CAMPAIGN LATE FILER

In the Matter of AIDS Healthcare Foundation, Yes on 21 - Renters and Homeowners United to Keep Families in Their Homes, Sponsored by AIDS Healthcare Foundation, and Beverly Grossman Palmer; FPPC Nos. 20/338, 20/759, 20/760, & 20/818.

Staff: Jenna Rinehart, Senior Commission Counsel, Paul Rasey, Special Investigator, and Bob Perna, Program Specialist. The AIDS Healthcare Foundation (“AHF”) is represented by Bradley W. Hertz of Law Offices of Bradley W. Hertz and the Yes on 21 Committee is represented by Beverly Grossman Palmer of Strumwasser & Woucher LLP. AHF, qualified as a lobbyist employer in 2019 and as a state major donor committee in 2020. The Yes on 21 Committee is a primarily formed state ballot measure committee for Proposition 21 on the November 3, 2020 General Election ballot sponsored by AHF. Palmer serves as the Yes on 21 Committee’s treasurer. AHF, as a

lobbyist employer, failed to timely disclose, on its lobbyist employer reports, other payments to influence, in violation of Government Code Sections 86116 and 86117 (4 counts). Next, AHF, as a major donor committee, failed to timely disclose, on a major donor campaign statement, non-monetary contributions made along with the payee information and source of funds used, in violation of Government Code Sections 84211 and 84222 (1 count). Additionally, AHF failed to timely disclose non-monetary contributions made and failed to timely file 24-Hour Reports, in violation of Government Code Sections 84211 and 84203 (2 counts). The Yes on 21 Committee and Palmer failed to timely file 10-day reports, in violation of Government Code Section 85309 (3 counts), and failed to timely file 24-Hour Reports, in violation of Government Code Sections 84203 and 84203.3 (3 counts).

Total Proposed Penalty: \$40,500.

In the Matter of Reverte Anselmo; FPPC No. 22/402.

Staff: Laura Columbel, Commission Counsel and Ann Flaherty, Special Investigator. The respondent is represented by Catherine Keenan of the Law Offices of Phillip Russell, LLC. Reverte Anselmo is a major donor committee. Anselmo failed to timely file four semi-annual campaign statements, in violation of Government Code Section 84200 (4 counts), and two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts).

Total Proposed Penalty: \$21,500.

APPENDIX B

LEGISLATION

Eleven bills amending the Political Reform Act were passed by the Legislature and signed by the Governor in 2025. Each bill takes effect on January 1, 2026, except as noted below.

1. AB 359 (Ramos) - Extension of Local Contracting Authority

AB 359 deletes the sunset provision in the statute that authorizes the FPPC to contract with local government agencies, upon mutual agreement, to administer, implement, and enforce the agency's local campaign finance or government ethics laws.

2. AB 789 (Bonta) - Use of Campaign Funds for Security Expenses

AB 789 permits elected officers and candidates to use campaign funds for security expenses, as defined, subject to no limit until January 1, 2029, after which each elected officer or candidate will be subject to a cap of \$10,000 per calendar year. The bill also clarifies which family members cannot be paid with campaign funds for these purposes.

3. AB 808 (Addis) - CAL-ACCESS Replacement System (CARS) Clean-Up Bill

AB 808 makes several conforming and streamlining amendments to sections in the PRA that become operative after the certification

of CARS by the Secretary of State, in order to facilitate the transition from form-based filing to all electronic filing on CARS.

4. AB 953 (Pacheco and Alanis) - Preventing Foreign Interference in California Elections

AB 953 expands the existing prohibition on foreign governments and foreign principals making contributions, expenditures, and independent expenditures to additionally prohibit a foreign national from making a contribution, expenditure, or independent expenditure in connection with a state or local ballot measure.

5. AB 1029 (Valencia) - Disclosure of Digital Financial Assets (Cryptocurrency)

Commencing January 1, 2027, AB 1029 revises the definition of "investment" to include a "digital financial asset," as defined, for purposes of disclosure on the Statement of Economic Interests (Form 700) and the conflict of interest provisions. As an investment under the PRA, digital financial assets will be subject to disclosure on the Form 700 in the same manner as other types of investments and could give rise to a conflict of interest if it was reasonably foreseeable that a government decision would have a material financial effect on the digital financial asset.

6. AB 1286 (Boerner) - Disclosure of Prospective Employment

AB 1286 requires the Statement of Economic Interests (Form 700) filers listed in Section

87200 to disclose arrangements for prospective employment on their Form 700s if the filer has accepted an offer of employment from the employer.

7. AB 1511 (Assembly Committee on Elections) - Transfer of Candidate Funds

AB 1511 revises the conditions under which a candidate who raises campaign funds for the general election before the primary election may transfer those general election funds to another candidate committee, such that a candidate whose name has not been listed on the ballot at the primary, and who has not qualified to have write-in votes cast on their behalf at the primary election, may transfer the funds to a committee established for the same or a different office, subject to specified attribution rules.

8. SB 42 (Umberg, Allen, and Cervantes) - Public Campaign Financing

Subject to voter approval at the November 3, 2026, statewide general election, SB 42 would repeal the prohibition on using public money for the purpose of seeking elective office and would thereby generally permit the creation of public campaign financing programs under certain conditions and restrictions. The bill would also make an unrelated change in the PRA to increase the maximum penalty for violations of the prohibition on foreign contributions, expenditures, and independent expenditures.

9. SB 760 (Allen) - Behested Payments Reporting Exemption for Public Appeals for Payment

SB 760 creates an exemption to the behested payment reporting requirements for public appeals for payment made via television, radio, billboard, public message on an online platform or, subject to certain conditions, a public speech. The reporting exemption does not apply if any of the behesting officer's immediate family or staff has a specified affiliation with the payee organization, or if the officer knows, within two years of the payment, that a specific payment was made in response to the officer's public appeal.

10. SB 827 (Gonzalez) - Ethics Training for Local Agency Officials

SB 827 expands the local agency ethics training requirements to an additional category of individuals and would shorten the deadline for completing the training. The bill makes additional changes unrelated to the FPPC or PRA.

11. SB 852 (Senate Elections and Constitutional Amendments Committee) - PRA Omnibus Bill

SB 852 (1) eliminates the manual notification requirement for PRA bills, due to the automated notice function available for PRA bills on leginfo. legislature.ca.gov, (2) makes a corrective change relating to electronic filing of statements of economic interests, and (3) expands the existing prohibition on delivering or receiving contributions in state offices and office buildings to additionally apply to local government offices and office buildings and legislative district offices.

APPENDIX C REGULATIONS

Summary of Substantive Regulatory Changes
Adopted by the Commission in 2025

1. Pay-to-Play (Levine Act) Regulatory Updates (SB 1243 & SB 1181)

Regulations 18360.1, 18438, 18438.2-18438.8, and 18705 were amended, and Regulation 18438.3 was repealed, to implement recent Levine Act legislation and to clarify and clean up the Commission's pay-to-play rules governing contributions, disqualification, and disclosure in proceedings before public agencies.

2. Electronic Filing and Public Access to Statements of Economic Interests (AB 1170)

Regulations 18115.2, 18313.5, 18313.6, 18724, 18730, 18754, and 18756 were amended, and Regulation 18753 was repealed, to implement AB 1170 by modernizing the filing and public posting of Statements of Economic Interests through the Commission's electronic filing system and eliminating obsolete filing provisions.

3. Prepaid Cards, Payment Processors, and Recordkeeping Requirements

Regulation 18430.1 was adopted, and Regulations 18421.3 and 18401 were amended, to establish requirements governing the use of prepaid cards for campaign contributions and expenditures, contributor verification requirements for online contribution platforms, and recordkeeping obligations for electronic payment processors.

4. Committee Termination and Reopening Requirements

Regulation 18404 was amended, and Regulations 18404.1 and 18404.3 were adopted and repealed, to reorganize the Commission's committee termination and reopening rules, clarify when filing obligations terminate, and specify the circumstances under which terminated committees may reopen.

5. Emergency Filing Deadline Relief (Los Angeles Wildfires)

Regulation 18720 was adopted to extend the 2025 annual Statement of Economic Interests filing deadline to June 2, 2025, for public officials in Los Angeles County due to wildfire-related disruptions.

For a full list of FPPC regulatory actions, visit [Newly Adopted, Amended, or Repealed Regulations](#).

ONLINE RESOURCES

The FPPC website has many educational resources.

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[All Learning Resource](#)

[Campaign and Lobbying Manuals](#)

Includes detailed guidance for state and local candidates, campaign committees, and lobbyists.

[Fact Sheets](#)

Includes quick and easy information on several subjects and answers to commonly asked questions.

[Campaign Rules](#)

Includes several resources for campaigns, including a Candidate Toolkit for new candidates and campaign advertisement disclosure charts.

[Financial Conflict of Interest Rules](#)

Guidance relating to the prohibition on participating in government decisions in which an official has a financial conflict of interest.

[Pay-to-Play Limits and Prohibitions](#)

Guidance for public officials who receive contributions from parties seeking a contract, license, permit, or other entitlement for use from the official's agency.

[The Political Reform Act](#)

Includes a copy of the Act, enforcement decision summaries, and other information updated yearly.

[FPPC Regulations](#)

Find all regulations, a list of newly amended or added regulations, and links to provide public comment on pending regulation changes.

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