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7
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
9 STATE OF CALIFORNIA

10
11 In the Matter of:

FPPC No: 10/070

12 ABEL MALDONADO, ABEL
13 MALDONADO FOR SENATE,
14 CHRISTOPHER J. RAYMER and,
15 CHRIS STEINBRUNER
Respondents.

STIPULATION, DECISION, and
ORDER

16
17 Complainant Roman G. Porter, Executive Director of the Fair Political Practices
18 Commission, and Respondents Abel Maldonado, Abel Maldonado for Senate, Christopher J.
19 Raymer, and Chris Steinbruner hereby agree that this Stipulation will be submitted for
20 consideration by the Fair Political Practices Commission at its next regularly scheduled meeting.

21 The parties agree to enter into this Stipulation to resolve all factual and legal issues raised
22 by this matter and to reach a final disposition without the necessity of holding an administrative
23 hearing to determine the liability of Respondents.

24 Respondents understand, and hereby knowingly and voluntarily waive, any and all
25 procedural rights set forth in Sections 83115.5, 11503 and 11523 of the Government Code, and
26 in Sections 18361.1 through 18361.9 of title 2 of the California Code of Regulations. This
27 includes, but is not limited to, the right to personally appear at any administrative hearing held in
28 this matter, to be represented by an attorney at Respondents' own expense, to confront and cross-

1 examine all witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to
2 have an impartial administrative law judge preside over the hearing as a hearing officer, and to
3 have the matter judicially reviewed.

4 It is further stipulated and agreed that Respondents violated the Political Reform Act by
5 failing to file late contribution reports, in violation of Government Code section 84203,
6 subdivisions (a) and (b) (2 Counts); by failing to file online campaign reports disclosing
7 contributions of \$1,000 or more received during an election cycle, in violation of Government
8 Code section 85309, subdivision (a) (8 Counts); and by failing to file online reports disclosing
9 contributions of \$5,000 or more received outside the election cycle, in violation of Government
10 Code section 85309, subdivision (c) (4 Counts); as described in Exhibit 1. Exhibit 1 is attached
11 hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and
12 accurate summary of the facts in this matter.

13 Respondents agree to the issuance of the Decision and Order, which is attached hereto.
14 Respondents also agree to the Commission imposing upon them an administrative penalty in the
15 amount of Twenty-Eight Thousand Dollars (\$28,000). A cashier's check from Respondents in
16 said amount, made payable to the "General Fund of the State of California," is submitted with
17 this Stipulation as full payment of the administrative penalty, and shall be held by the State of
18 California until the Commission issues its Decision and Order regarding this matter. The parties
19 agree that in the event the Commission refuses to accept this Stipulation, it shall become null and
20 void, and within fifteen (15) business days after the Commission meeting at which the
21 Stipulation is rejected, all payments tendered by Respondents in connection with this Stipulation
22 shall be reimbursed to Respondents. Respondents further stipulate and agree that in the event the
23 Commission rejects the Stipulation, and a full evidentiary hearing before the Commission
24 becomes necessary, neither any member of the Commission, nor the Executive Director, shall be
25 disqualified because of prior consideration of this Stipulation.

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Dated: _____

Roman G. Porter, Executive Director
Fair Political Practices Commission

Dated: _____

Abel Maldonado, individually and on behalf of
Abel Maldonado for Senate, Respondents

Dated: _____

Christopher J. Raymer, individually and on behalf
of Abel Maldonado for Senate, Respondents

Dated: _____

Chris Steinbruner, individually and on behalf
of Abel Maldonado for Senate, Respondents

DECISION AND ORDER

The foregoing Stipulation of the parties “In the Matter of Abel Maldonado, Abel Maldonado for Senate, Christopher J. Raymer, and Chris Steinbruner, FPPC No.10/070,” including all attached Exhibits, is hereby accepted as the final Decision and Order of the Fair Political Practices Commission, effective upon execution below by the Chairman.

IT IS SO ORDERED.

Dated: _____

Ann Ravel, Chair
Fair Political Practices Commission

EXHIBIT 1

INTRODUCTION

Respondent Abel Maldonado (“Respondent Maldonado”) was elected to the California State Senate on November 2, 2004, representing the 15th District. During the period Respondent Maldonado was serving in the State Senate, he unsuccessfully ran for California State Controller in the June 6, 2006 Primary Election. Respondent Maldonado ran for re-election to the State Senate and won in the June 3, 2008 Primary Election and was re-elected to the State Senate in the November 4, 2008 General Election.

The Abel Maldonado for Senate committee, I.D. No. 1272517 (“Respondent Committee”), was created on December 23, 2004, as a candidate controlled committee for Respondent Maldonado’s 2008 State Senate campaign. During the period covering May 20, 2005, through February 28, 2008, Respondent Christopher J. Raymer (“Respondent Raymer”) was the Treasurer for Respondent Committee. Respondent Raymer was also the treasurer for Respondent Maldonado’s State Controller campaign committee during this same period. During the period covering February 29, 2008, through July 30, 2009, Respondent Chris Steinbruner (“Respondent Steinbruner”) was the Treasurer for Respondent Committee.

This matter arose from a Franchise Tax Board (“FTB”) audit for the period January 1, 2004, through December 31, 2008. During the period covered by the audit, Respondent Committee reported receiving contributions of \$1,978,666 and making expenditures totaling \$2,012,227.

The Respondents violated the requirements of the Political Reform Act (the “Act”)¹ by: (1) failing to file late contribution reports; (2) failing to file online campaign reports disclosing contributions of \$1,000 or more during the 90 day period before an election; and (3) failing to file online campaign reports disclosing contributions received of \$5,000 or more outside the 90 day period before an election.

For the purposes of settlement, Respondents’ violations of the Act are stated as follows:

LATE CONTRIBUTION REPORTS

Count 1: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Christopher Raymer failed to report, on a late contribution report, a \$25,000

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 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.

contribution made to the Monterey County Republican Party – State Account, during the late contribution reporting period before the February 5, 2008 Presidential Primary Election, in violation of Government Code section 84203, subdivisions (a) and (b).

Count 2: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to report , on a late contribution report, a \$50,000 contribution made to the California Republican Party, during the late contribution reporting period before the November 4, 2008 General Election, in violation of Government Code section 84203, subdivisions (a) and (b).

\$1,000 ONLINE REPORTS

Count 3: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing eleven contributions of \$1,000 or more, totaling \$12,000, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about March 5, 2008, due on or about March 6, 2008, in violation of Government Code section 85309, subd. (a).

Count 4: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing three contributions of \$1,000 or more, totaling \$3,000, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about March 6, 2008, due on or about March 7, 2008, in violation of Government Code section 85309, subd. (a).

Count 5: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing three contributions of \$1,000 or more, totaling \$3,000, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about March 18, 2008, due on or about March 19, 2008, in violation of Government Code section 85309, subd. (a).

Count 6: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing six contributions of \$1,000 or more, totaling \$15,400, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about March 27, 2008, due on or about March 28, 2008, in violation of Government Code section 85309, subd. (a).

Count 7: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing five contributions of \$1,000 or more, totaling \$5,000, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about April 3,

2008, due on or about April 4, 2008, in violation of Government Code section 85309, subd. (a).

- Count 8: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing three contributions of \$1,000 or more, totaling \$4,000, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about April 8, 2008, due on or about April 9, 2008, in violation of Government Code section 85309, subd. (a).
- Count 9: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing three contributions of \$1,000 or more, totaling \$4,000, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about April 11, 2008, due on or about April 12, 2008, in violation of Government Code section 85309, subd. (a).
- Count 10: Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Chris Steinbruner failed to file an online campaign report disclosing six contributions of \$1,000 or more, totaling \$15,200, with the Secretary of State, during the 90-day period before the June 3, 2008 Primary Election, received on or about May 16, 2008, due on or about May 17, 2008, in violation of Government Code section 85309, subd. (a).

\$5,000 ONLINE REPORTS

- Count 11: In 2007, outside the 90-day period before an election, Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Christopher Raymer received two contributions of \$5,000 or more, for a total of \$450,000 from the California Republican Party, and failed to disclose the contributions within 10 business days of receipt in an online campaign report, in violation of Government Code section 85309, subd. (c).
- Count 12: In 2006 and 2007, outside the 90-day period before an election, Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Christopher Raymer received seven contributions of \$5,000 or more, for a total of \$156,172 from the county party committees, and failed to disclose the contributions within 10 business days of receipt in an online campaign report, in violation of Government Code section 85309, subd. (c).
- Count 13: In 2007, outside the 90-day period before an election, Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Christopher Raymer received nine contributions of \$5,000 or more, for a total of \$65,400 from various individuals, and failed to disclose the contributions

within 10 business days of receipt in an online campaign report, in violation of Government Code section 85309, subd. (c).

Count 14: On January 11, 2008, outside the 90-day period before an election, Respondents Abel Maldonado, Abel Maldonado for Senate, and Treasurer Christopher Raymer received a contribution of \$5,000 or more, for \$50,000, from Abel Maldonado, and failed to disclose the contribution within 10 business days of receipt in an online campaign report, in violation of Government Code section 85309, subd. (c).

SUMMARY OF THE LAW

Duty to File Periodic Campaign Statements and Reports

An express purpose of the Act, as set forth in Section 81002, subdivision (a), is to ensure that receipts and expenditures in election campaigns are fully and truthfully disclosed, so that voters may be fully informed, and improper practices may be inhibited. The Act therefore establishes a comprehensive campaign reporting system designed to accomplish this purpose of disclosure.

Section 82013, subdivision (a), defines a “committee” to include any person who receives contributions totaling \$1,000 or more in a calendar year. This type of committee is commonly referred to as a “recipient committee.” Under Section 82016, a recipient committee controlled by a candidate is a “controlled committee.”

Duty to File Late Contribution Reports

Under Section 84203, subdivisions (a) and (b), when a committee makes or receives a late contribution, the committee must disclose the contribution in a late contribution report within 24 hours of making or receiving the contribution. Section 82036, subdivision (b), defines a “late contribution,” in relevant part, as a contribution which totals in the aggregate one thousand dollars (\$1,000) or more that is made to or received by, a political party committee before the date of any state election but after the closing date of the last campaign statement required to be filed before the election. Under Sections 84200.7 and 84200.8, the late contribution reporting period of an election covers the last 16 days before the election.

Duty to File Reports Online

In order to maximize the availability of information regarding campaign disclosure to the public, the Act requires any candidate, officeholder, committee, or other person who is required to file statements, reports, or other documents in connection with a state elective office to file them online or electronically when the total cumulative reportable amount of contributions

received, expenditures made, loans made, or loans received is \$50,000 or more. (§ 84605, subd. (a).)

Once a person or entity is required to file online or electronically, the person or entity is required to file all subsequent reports online or electronically as well. (§ 84605, subd. (g).) Persons filing online or electronically are also required to continue to file required disclosure statements and reports in paper format, which continue to be the official filing for audit and other legal purposes until the Secretary of State determines the system is operating securely and effectively. (§ 84605, subd. (i).)

Duty to Report Contributions Received During the Election Cycle of \$1,000 or More

A candidate for elective state office who is required to file reports pursuant to Section 84605 shall file online or electronically with the Secretary of State a report disclosing receipt of a contribution of \$1,000 or more received during an election cycle. Those reports shall disclose the same information required by subdivision (a) of Section 84203 and shall be filed within 24 hours of receipt of the contribution. (§85309, subd. (a).) “Election cycle” for the purposes of Section 85309 means the period of time commencing 90 days prior to an election and ending on the date of the election. (§ 85204.)

Duty to Report Contributions Received Outside the Election Cycle of \$5,000 or More

A candidate for elective state office who is required to file campaign reports online or electronically is also required to file a campaign report online or electronically within 10 business days of receipt of every contribution of \$5,000 or more that is received at any other time than during the election cycle. (§ 85309, subd. (c).) This campaign report must disclose specified information regarding the contribution and is not required to be filed in paper format. (*Ibid.*)

Joint and Several Liability of Candidate and Treasurer

Under Section 81004, subdivision (b), Section 84100, and Regulation 18427, it is the duty of a candidate and the treasurer of his or her controlled committee to ensure that the committee complies with all of the requirements of the Act concerning the receipt and expenditure of funds, and the reporting of such funds. A candidate and the treasurer of his or her controlled committee may be held jointly and severally liable, along with the committee, for any reporting violations committed by the committee. (See Sections 83116.5 and 91006.)

SUMMARY OF THE FACTS

On November 2, 2004, Respondent Maldonado was elected to the California State Senate, representing the 15th District. During the period Respondent Maldonado was serving in the State Senate, he unsuccessfully ran for California State Controller in the June 6, 2006 Primary Election. Respondent Maldonado ran for re-election to the State Senate and won in the June 3, 2008 Primary Election and was re-elected to the State Senate in the November 4, 2008 General Election.

Respondent Committee was created on December 23, 2004, as a candidate controlled committee for Respondent Maldonado's 2008 State Senate campaign. During the period covering May 20, 2005, through February 28, 2008, Respondent Raymer was the Treasurer for Respondent Committee. Respondent Raymer was also the treasurer for Respondent Maldonado's State Controller campaign committee during this same period. During the period covering February 29, 2008, through July 30, 2009, Respondent Steinbruner was the Treasurer for Respondent Committee.

This matter arose from an FTB audit for the period January 1, 2004, through December 31, 2008. During the period covered by the audit, Respondent Committee reported receiving contributions of \$1,978,666 and making expenditures totaling \$2,012,227. Respondent Committee exceeded the \$50,000 threshold for online filing requirements prior to the period audited.

Counts 1-2

Failure to File Late Contribution Reports

Under Section 84203, subdivision (a), Respondents were required to file late contribution reports disclosing, within 24 hours of making, any contribution cumulating \$1,000 or more during the late reporting period. A late contribution includes a contribution which totals in the aggregate one thousand dollars (\$1,000) or more that is made to or received by, a political party committee before the date of any state election but after the closing date of the last campaign statement required to be filed before the election. The late contribution period for the February 5, 2008 Presidential Primary Election was January 20, 2008, through February 4, 2008. The late contribution reporting period for the November 4, 2008 General Election was October 19, 2008, through November 3, 2008.

Respondents failed to disclose making two late contributions in properly filed late contribution reports. The subject late contributions are shown in the following table, according to the count to which they correspond.

Count	Committee Receiving the LCR	Date Made	LCR Due Date	Amount
1	Monterey County Republican Party	1/21/2008	1/22/2008	\$ 25,000.00
2	California Republican Party	10/30/2008	10/31/2008	\$ 50,000.00
			Total:	\$ 75,000

By failing to properly disclose late contributions made in properly filed late contribution reports, as set forth above, Respondents committed two counts of violating Section 84203, subdivisions (a) and (b).

Counts 3-10

Failure to Report Contributions of \$1,000 or More Online

During the 90-day period before the June 3, 2008 Primary Election, Respondents were required to disclose each contribution of \$1,000 or more in an online campaign report filed within 24 hours of receipt.

In this matter, Respondents failed to disclose 40 contributions of \$1,000 or more during these reporting periods within 24 hours of receipt in online campaign reports, totaling \$61,600. The unreported contributions are shown in the following table, according to the count to which they correspond.

Count	Date Received	Contributor(s)	Amount
3	March 5, 2008	California Association of Health Underwriters PAC	\$ 1,000
		Miller Brewing Company	\$1,000
		John B. Lovewell	\$1,000
		Abdallah Saah	\$1,000
		Charles B. Cameron	\$1,000
		Greater Anesthesia Service and PAC	\$1,000
		Monterey Peninsula Surgery Center, LLC	\$2,000
		Anthony Metten	\$1,000
		Howard W. Wahl	\$1,000
		California Forestry Association PAC	\$1,000

		California Veterinary Medical Association Political Action Committee	\$1,000
4	March 6, 2008	ROEM Development Corporation	\$1,000
		Glaze Property Management, LLC	\$1,000
		Charles Leider, TTEE	\$1,000
5	March 18, 2008	Donald Winn	\$1,000
		Dairy Institute Legislative Committee	\$1,000
		Peter M. Radin, Jr.	\$1,000
6	March 27, 2008	Blue Cross of California	\$1,000
		CBS Outdoor	\$3,600
		Lopez Tax Service, Inc.	\$1,000
		CDF Firefighters Small Contributor PAC	\$1,000
		Brian A. Mansfield	\$1,600
		Kimberly L. Edwards	\$7,200
7	April 3, 2008	California Giant, Inc.	\$1,000
		Coyote Housing Group, LLC	\$1,000
		CAMPAC CMBA Political Action Committee Two	\$1,000
		eBay, Inc.	\$1,000
		United HealthCare Services, Inc.	\$1,000
8	April 8, 2008	Karen Miller	\$2,000
		Security PAC	\$1,000
		BNSF Railway Company	\$1,000
9	April 11, 2008	A.C. Smith	\$1,000
		Thomas J. Nieto	\$2,000
		Braga Ranch	\$1,000
10	May 16, 2008	California Teachers Assn. Assn for Better Citizenship	\$7,200
		Rosa Mata Boutonnet	\$2,000

		Hewlett Packard	\$2,000
		Victory Dealership Group	\$2,000
		California New Car Dealers Association PAC	\$1,000
		John Deere Political Action Committee	\$1,000
		Total:	\$61,600

By failing to file online campaign reports disclosing contributions of \$1,000 or more received during the election cycle, as set forth above, Respondents committed eight violations of Section 85309, subdivision (a).

Counts 11-14

Failure to Report Contributions of \$5,000 or More Online

Respondents were required to disclose each contribution of \$5,000 or more received at a time other than during an election cycle in an online campaign report filed within 10 business days of receipt.

In this matter, Respondents failed to disclose 18 contributions of \$5,000 or more during the reporting periods within 10 days of receipt in online campaign reports, totaling \$721,572. The unreported contributions are shown in the following table, according to the count to which they correspond.

Count	Date Received	Contributor(s)	Amount
11	June 27, 2007	California Republican Party	\$200,000
	December 21, 2007	California Republican Party	\$250,000
12	December 12, 2006	Monterey County Republican Party	\$30,000
	August 14, 2007	Monterey County Republican Central Committee	\$9,212
	August 24, 2007	Monterey County Republican Central Committee	\$6,960
	December 21, 2007	Republican Central Committee of Orange County	\$50,000
	December 27, 2007	Santa Clara County Republican Party	\$30,000

	December 31, 2007	Yolo County Republican Party	\$13,000
	December 31, 2007	Yolo County Republican Party	\$17,000
13	February 16, 2007	Taxpayers for Ackerman	\$7,200
	March 16, 2007	Taxpayers for Dave Cox-Senate 2008	\$7,200
	April 3, 2007	Michael E. Fox, Sr.	\$7,200
	April 20, 2007	Rosa Mata Boutonnet	\$10,000
	May 18, 2007	Lincoln Club of Northern California PAC	\$7,200
	June 25, 2007	Jeffrey Burum Enterprises	\$5,000
	June 25, 2007	Bob Dutton for State Senate 2008	\$7,200
	July 25, 2007	Charles T. Munger, Jr., TTEE	\$7,200
	October 19, 2007	Ocean Mist Farms	\$7,200
14	January 11, 2008	Abel Maldonado	\$50,000
		Total:	\$721,572

By failing to file online campaign reports disclosing contributions of \$5,000 or more received outside the election cycle, as set forth above, Respondents committed four violations of Section 85309, subdivision (c).

CONCLUSION

This matter consists of fourteen counts, which carries a maximum possible administrative penalty of Seventy Thousand Dollars (\$70,000).

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division considers the facts and circumstances of the violation in context of the factors set forth in Regulation 18361.5, subdivision (d)(1)-(6): the seriousness of the violations; the presence or lack of intent to deceive the voting public; whether the violation was deliberate, negligent, or inadvertent; whether the Respondent demonstrated good faith in consulting with Commission staff; and whether there was a pattern of violations.

This matter involves multiple campaign reporting violations. The public harm inherent in these types of violations, where pertinent information is not disclosed before an election, is that the public is deprived of important information such as the sources and amounts of contributions to a campaign and the amounts expended by the campaign.

AGGRAVATING FACTORS

Respondents failed to file multiple campaign reports disclosing contributions both made and received by the Respondent Committee. Additionally, a large amount of campaign activity should have been reported in online campaign statements.

MITIGATING FACTORS

Respondent Maldonado was unopposed in the June 3, 2008 Primary Election. Additionally, the Enforcement Division staff confirmed the FTB findings that the Respondents substantially complied with the reporting requirements of the Act. None of the reporting omissions in this matter were in any way deliberate. Respondent Maldonado retained the services of professional accountants to act as treasurers and relied on these treasurers to comply with the Act's requirements. Further, in regard to Counts 1 and 2, the late contributions were timely reported by the committees that received the late contributions in properly filed late contribution reports.

COUNTS 1 - 2

With regard to the late contribution reports, the typical stipulated administrative penalty for failing to file late contribution reports for cases resolved outside of the Streamlined Late Contribution Enforcement Program has varied, depending on the circumstances of the violation. In this matter, Respondents failed to file two late contribution reports made to political party committees prior to two separate elections. In mitigation, these late contributions were properly reported by the committees that received the late contributions in properly filed late contribution reports. Thus, a stipulated administrative penalty of \$2,000 per count is appropriate for these violations.

COUNTS 3 – 10

With regard to the \$1,000 online reporting violations, the typical administrative penalty for failing to file online reports within 24 hours disclosing contributions of \$1,000 or more received during the election cycle have historically resulted in penalties in the mid to low range of the available penalties, depending on the facts of the case. In this matter, Respondents failed to report 40 contributions in eight separate online campaign election cycle reports, totaling \$61,600. In mitigation, the amount that Respondents failed to report is small relative to the Respondent Committee size and the amount of the reported contributions and expenditures. Thus, a stipulated administrative penalty of \$2,000 per count is appropriate for these violations.

COUNTS 11 - 14

With regard to the \$5,000 online reporting violations, the typical administrative penalty for failing to file online reports within 10 days disclosing contributions of \$5,000 or more received at a time other than during the election cycle have historically resulted in penalties in the mid to low range of the available penalties, depending on the facts of the case. In this matter, Respondents failed to disclose 19 contributions of \$5,000 or more during the reporting periods within 10 days of receipt in online campaign reports, totaling \$721,572. Thus, a stipulated administrative penalty of \$2,000 per count is appropriate for these violations.

Accordingly, the facts and circumstances of this case justify a total stipulated administrative penalty of \$28,000.