



STATE OF CALIFORNIA  
**FAIR POLITICAL PRACTICES COMMISSION**  
428 J Street • Suite 620 • Sacramento, CA 95814-2329  
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**MEMORANDUM**

To: Chair Remke, and Commissioners Audero, Casher, Wasserman and Wynne

From: Erin V. Peth, Executive Director  
Galena West, Chief of Enforcement  
Dave Bainbridge, Assistant Chief of Enforcement

Date: July 5, 2016

RE: Assignment of Hearing to Administrative Law Judge (“ALJ”)

Case Name: In the Matter of James Roybal and James Roybal for Board of Directors Central Basin Water District 1 2012 (FPPC Case No. 14/049)

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**I. INTRODUCTION**

Respondent James B. Roybal was elected to the Board of Directors (“Board”) of the Central Basin Municipal Water District (“Central Basin”) in the June 2012 primary election. Respondent James B. Roybal for Board of Directors of the Central Basin Municipal Water District 1 2012 (the “Committee”) was his controlled committee for the election.

Roybal and the Committee had a duty under the Political Reform Act (Act)<sup>1</sup> to timely disclose on the Committee’s campaign statements information about contributors who made contributions to the Committee of \$100 or more. Roybal and the Committee violated the Act by failing to disclose required information for twelve contributors who made contributions to the Committee of \$100 or more.

Roybal and the Committee have requested an administrative hearing on the Accusation issued in this case, a copy of which is attached hereto as Exhibit A.

**II. COMMISSION ACTION IS ONLY REQUIRED IF THE COMMISSION DESIRES TO PARTICIPATE IN THE ADMINISTRATIVE HEARING**

The Executive Director and the Chief of Enforcement are recommending a hearing should be conducted before an Administrative Law Judge (“ALJ”) pursuant to Section 11512, subdivision (a). The ALJ will then make a recommendation to the Commission on the findings of fact, law and penalty, if applicable, in the matter. The Commission will then have the opportunity to make the final determination on the case.

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

This memorandum is submitted to each member of the Commission pursuant to Regulation 18361.5, subdivision (b), which provides:

If the Executive Director determines that a hearing on the merits should be conducted before an administrative law judge alone pursuant to Government Code section 11512(a), he or she shall provide a copy of the accusation as well as a memorandum describing the issues involved to each member of the Commission. If, at the next regularly scheduled meeting, two or more Commissioners indicate a desire to participate in the hearing, the matter will be scheduled for a hearing before the Commission when an administrative law judge is available.

Thus, no Commission action is required if the Commission approves of the recommendation that the administrative hearing in this matter should be conducted before an ALJ. However, two or more Commissioners may vote to keep the matter with the Commission, if so desired.

### **III. PROCEDURAL HISTORY**

A probable cause hearing was held on February 4, 2016. On February 10, 2016, the Hearing Officer issued an Order Re: Probable Cause ("Order"). The Order included a finding that there is probable cause to believe Roybal and the Committee violated the Act, as set forth in Exhibit A.

On April 18, 2016, the Accusation was personally served on the attorney of record for Roybal and the Committee. On or about May 2, 2016, Roybal and the Committee submitted a Notice of Defense, requesting a hearing.

### **IV. PROCEDURAL ISSUES**

Every hearing in a contested case must be presided over by an ALJ. The agency must determine whether the ALJ is to hear the case alone or whether the agency is to hear the case with the ALJ.<sup>1</sup>

When the agency hears the case, the ALJ must preside at the hearing, rule on the admission and exclusion of evidence, and advise the agency on matters of law; the agency may exercise all other powers relating to the conduct of the hearing but may delegate any or all of them to the ALJ. When the ALJ alone hears a case, he or she shall exercise all powers relating to the conduct of the hearing. A ruling of the ALJ admitting or excluding evidence is subject to review in the same manner and to the same extent as the ALJ's proposed decision in the proceeding.<sup>2</sup>

### **V. SUMMARY OF THE ACCUSATION**

Roybal was elected to the Central Basin in the 2012 primary election. During 2012, the Committee received twelve contribution checks of \$100 or more that it failed to disclose on the

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<sup>1</sup> Section 11512, subd. (a).

<sup>2</sup> Section 11512, subd. (b)

Committee's campaign statements. Each of the checks for these contributions was deposited in the Committee's bank account. The contributions consisted of the following:

Name of Contributor	Amount of Contribution	Date Deposited	Statement Period
Henrietta Correa Salazar	\$200	April 20, 2012	January 1 – May 19, 2012
Marcy Gloria Grajeda	\$250	May 1, 2012	January 1 – May 19, 2012
Edward Sarkissian, Jr.	\$500	May 1, 2012	January 1 – May 19, 2012
Betsy Chang	\$150	May 1, 2012	January 1 – May 19, 2012
Victor Caballero	\$100	May 1, 2012	January 1 – May 19, 2012
James and/or Michele Ciampa	\$400	May 29, 2012	May 20 – June 30, 2012
Golden State Advocacy	\$250	July 30, 2012	July 1 – December 31, 2012
Romejan, Inc.	\$250	July 30, 2012	July 1 – December 31, 2012
Antonio Mendoza	\$100	July 30, 2012	July 1 – December 31, 2012
Southwest Management Consultants	\$500	July 30, 2012	July 1 – December 31, 2012
Davenport Management, Inc.	\$250	July 30, 2012	July 1 – December 31, 2012
Model City Democratic Club	\$400	September 28, 2012	July 1 – December 31, 2012
<b>Total:</b>	<b>\$3,350</b>		

The Committee timely filed campaign statements for the January 1 through May 19, 2012, May 20 through June 30, 2012, and July 1 through December 31, 2012 statement periods. Additionally, on January 29, 2014, the Committee filed amendments to each of the three campaign statements at the request of the Los Angeles County Clerk. However, neither the original filings, nor the amended statements, disclosed the amount and date of the contributions listed above, or provided the name, address, occupation, and employer of the contributors.

The Accusation consists of 3 counts.

**Count 1** – Roybal and the Committee failed to disclose five contributions of \$100 or more on a pre-election statement for the period of January 1, 2012 through May 19, 2012 in violation of Section 84211, subdivisions (c) and (f).

**Count 2** – Roybal and the Committee failed to disclose one contribution of \$100 or more on a semi-annual statement for the period of May 20, 2012 through June 30, 2012 in violation of Section 84211, subdivisions (c) and (f).

**Count 3** – Roybal and the Committee failed to disclose six contributions of \$100 or more on a semi-annual statement for the period of July 1, 2012 through December 31, 2012 in violation of Section 84211, subdivisions (c) and (f).

The Accusation requests a monetary penalty pursuant to Section 83116, subdivision (c), of up to \$5,000 per count, for a total monetary penalty not to exceed \$15,000.

## VI. CONCLUSION

If, at the next regularly scheduled meeting, two or more Commissioners indicate a desire to participate in the hearing, the matter will be scheduled for a hearing before the Commission when an ALJ is available. (Regulation 18361.5, subd. (b).) Otherwise, hearing of this matter will be conducted before an ALJ alone pursuant to Section 11512, subdivision (a).

# EXHIBIT A

GALENA WEST  
 Chief of Enforcement  
 DAVE BAINBRIDGE  
 Assistant Chief of Enforcement  
**FAIR POLITICAL PRACTICES COMMISSION**  
 428 J Street, Suite 620  
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Attorneys for Complainant

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
 STATE OF CALIFORNIA

In the Matter of

JAMES B. ROYBAL and  
 JAMES B. ROYBAL FOR BOARD OF  
 DIRECTORS CENTRAL BASIN  
 MUNICIPAL WATER DISTRICT 1 2012,

Respondents.

)  
 ) OAH No. \_\_\_\_\_  
 )  
 ) FPPC No. 14/049  
 )  
 ) ACCUSATION  
 )  
 ) (Gov. Code §11503)  
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Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding of probable cause made pursuant to Government Code section 83115.5, hereby alleges the following:

**JURISDICTION**

1. Complainant is the Enforcement Division of the Fair Political Practices Commission and makes this Accusation in its official capacity and in the public interest.
2. The authority to bring this action is derived from California Code of Regulations, title 2, sections 18361 and 18361.4, subdivision (e), and the statutory law of the State of California, including, Government Code sections 83111, 83116, and 91000.5, which assign to the Enforcement Division the duty to administer, implement, and enforce the provisions of the Political Reform Act, found at Government Code sections 81000 through 91014.

1 3. When enacting the Political Reform Act (the "Act"),<sup>1</sup> California voters specifically found  
2 and declared that previous laws regulating political practices had suffered from inadequate enforcement,  
3 and it was their purpose to ensure that the Act be vigorously enforced.<sup>2</sup>

4 4. To that end, the Act must be liberally construed to achieve its purposes.<sup>3</sup>

5 5. One of the stated purposes of the Act is to ensure that receipts and expenditures in  
6 election campaigns are fully and truthfully disclosed, so that voters may be fully informed, and improper  
7 practices may be inhibited.<sup>4</sup> In furtherance of this purpose, the Act establishes a comprehensive  
8 campaign reporting system.

9 **RESPONDENTS**

10 6. Respondent James B. Roybal is a director on the Board of Directors ("Board") of the  
11 Central Basin Municipal Water District ("Central Basin").

12 7. Respondent James B. Roybal for Board of Directors of the Central Basin Municipal  
13 Water District 1 2012 ("Committee") was Roybal's controlled committee for the 2012 primary election.

14 **APPLICABLE LAW**

15 8. All applicable law referenced herein is the law as it existed during the relevant time for  
16 the violations alleged in this Accusation.

17 **A. Definitions**

18 9. A "candidate" is an individual who is listed on the ballot for election to any elective  
19 office.<sup>5</sup>

20 10. A "controlled committee" is a committee that is controlled by a candidate. A candidate  
21 controls a committee if he has significant influence on the actions or decisions of a committee.<sup>6</sup>

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24 <sup>1</sup>The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references  
25 are to this code. The regulations of the Fair Political Practices Commission are contained in §§ 18110 through 18997 of Title  
2 of the California Code of Regulations, and all regulatory references are to this source.

26 <sup>2</sup> §§ 81001, subd. (h), and 81002, subd. (f).  
27 <sup>3</sup> § 81003.  
<sup>4</sup> § 81002, subd. (a).  
<sup>5</sup> § 82007.  
<sup>6</sup> § 82016.

1 **B. Duty to File Campaign Statements**

2 11. The Act requires candidate-controlled committees to file campaign statements with  
3 designated filing officers at specific times disclosing information regarding campaign contributions  
4 received and expenditures made by the campaign committees.<sup>7</sup> For the 2012 primary election,  
5 candidate-controlled committees in Los Angeles County elections were required to file with the Los  
6 Angeles County Clerk's Office ("County Clerk") a pre-election statement by May 24, 2012 for the  
7 period ending May 19, 2012, a semi-annual statement by July 31, 2012 for the May 20 through June 30,  
8 2012 reporting period, and a semi-annual statement by January 31, 2013 for the July 1 through  
9 December 31, 2012, reporting period.<sup>8</sup>

10 **C. Duty to Disclose Contributions on Campaign Statements**

11 12. On a campaign statement, a candidate-controlled committee must disclose the total  
12 amount of contributions the committee received during that statement period.<sup>9</sup>

13 13. Candidate-controlled committees also must disclose on a campaign statement the total  
14 amount of contributions received during the statement period from persons who have given a cumulative  
15 amount of \$100 or more.<sup>10</sup>

16 14. For any contribution of \$100 or more, candidate-controlled committees must disclose on  
17 its campaign statement the date and amount of the contribution, as well as name, address, occupation,  
18 and employer of the contributor.<sup>11</sup>

19 **D. Candidate Liability**

20 15. It is the duty of a candidate to ensure that his controlled committee complies with all of  
21 the requirements of the Act concerning the receipt and expenditure of funds, and the reporting of such  
22 funds.<sup>12</sup> A candidate may be held jointly and severally liable, along with his controlled committee, for  
23 any reporting violations.<sup>13</sup>

24 <sup>7</sup> §§ 84200 through 84225.

25 <sup>8</sup> §§ 84200, subd. (a), 84200.5, subd. (b), 84200.7, subd. (a)(2), and 84215, subd. (c).

26 <sup>9</sup> § 84211, subd. (a).

27 <sup>10</sup> § 84211, subd. (c).

28 <sup>11</sup> § 84211, subd. (f).

<sup>12</sup> §§ 81004, subd. (b), 84100; Regs. 18427, subd. (a).

<sup>13</sup> §§ 83116.5 and 91006.



1 **E. Factors for the Commission to Consider**

2 16. In framing a proposed order following a finding of a violation pursuant to section 83116,  
3 the Fair Political Practices Commission ("Commission"), and the administrative law judge, shall  
4 consider all the surrounding circumstances, including: (1) the seriousness of the violation; (2) the  
5 presence or absence of any intention to conceal, deceive or mislead; (3) whether the violation was  
6 deliberate, negligent or inadvertent; (4) whether the violator demonstrated good faith by consulting the  
7 Commission staff or any other government agency in a manner not constituting a complete defense  
8 under section 83114(b); (5) whether the violation was isolated or part of a pattern and whether the  
9 violator has a prior record of violations of the Act or similar laws; and (6) whether the violator, upon  
10 learning of a reporting violation, voluntarily filed amendments to provide full disclosure.<sup>14</sup>

11 **GENERAL FACTS**

12 17. Roybal filed a Statement of Organization (Form 410) with the Los Angeles County  
13 Clerk's Office ("County Clerk") on April 6, 2012 thereby creating the Committee.

14 18. Roybal was elected to the Board in the primary election held on June 5, 2012, and took  
15 office in January of 2013.

16 19. As of the date of this Accusation, Roybal is still on the Board and serves as the Board's  
17 vice president.

18 20. The Committee timely filed campaign statements for the January 1 – May 19, 2012,  
19 May 20 – June 30, 2012, and July 1 – December 31, 2012 statement periods. Additionally, on  
20 January 29, 2014, the Committee filed amendments to each of the three campaign statements at the  
21 request of the County Clerk.

22 **PROCEDURAL HISTORY**

23 21. The Enforcement Division initiated this administrative action against Roybal and the  
24 Committee by serving them with a Report in Support of a Finding of Probable Cause (the "Report").  
25 Roybal and the Committee were served via their attorney by certified mail on November 23, 2015.<sup>15</sup>

26  
27 <sup>14</sup> Reg. 18361.5, subd. (d).

<sup>15</sup> §§ 83115.5 and 91000.5.

1 22. At the request of Roybal and the Committee, the Commission held a probable cause  
2 hearing on February 4, 2016 at the offices of the Commission.<sup>16</sup> Roybal appeared at the hearing by  
3 telephone and was represented by legal counsel.

4 23. On February 10, 2016, the Commission's Hearing Officer issued a Finding of Probable  
5 Cause and Order to Prepare and Serve an Accusation. Subsequently, a copy of that order was served on  
6 Roybal and the Committee by U.S. mail.

7 **VIOLATIONS**

8 24. Roybal and the Committee committed three violations of the Act, as follows:

9 **Count 1**

10 **Failure to Disclose Contributions of \$100 or more on a Pre-election Statement**

11 25. Complainant incorporates paragraphs 1 – 24 of this Accusation, as though completely set  
12 forth herein.

13 26. Roybal and the Committee had a duty to disclose, on the Committee's pre-election  
14 campaign statement for the period ending on May 19, 2012, the total amount of contributions received  
15 during the period from persons who contributed \$100 or more, as well as the name, street address,  
16 occupation, employer name, date, and cumulative amount of contributions for each person who  
17 contributed \$100 or more to the Committee during the statement period.

18 27. The Committee received a contribution of \$200 from Henrietta Correa Salazar on or  
19 about April 20, 2012. The Committee did not disclose receiving this contribution on its campaign  
20 statement for this period. The Committee's campaign statement also did not disclose the name, street  
21 address, occupation, and employer name for Ms. Salazar.

22 28. The Committee received a contribution of \$250 from Marcy Gloria Grajeda on or about  
23 May 1, 2012. The Committee did not disclose receiving this contribution on its campaign statement for  
24 this period. The Committee's campaign statement also did not disclose the name, street address,  
25 occupation, and employer name for Ms. Grajeda.

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27 <sup>16</sup> § 83115 and Reg. 18361.4

1           29.     The Committee received a contribution of \$500 from Edward Sarkissian, Jr. on or about  
2     May 1, 2012. The Committee did not disclose receiving this contribution on its campaign statement for  
3     this period, nor did the Committee's campaign statement disclose the name, street address, occupation,  
4     and employer name for Mr. Sarkissian.

5           30.     The Committee received a contribution of \$150 from Betsy Chang on or about May 1,  
6     2012. The Committee did not disclose receiving this contribution on its campaign statement for this  
7     period. The Committee's campaign statement also did not disclose the name, street address, occupation,  
8     and employer name for Ms. Chang.

9           31.     The Committee received a contribution of \$100 from Victor Caballero on or about May  
10    1, 2012. The Committee did not disclose receiving this contribution on its campaign statement for this  
11    period. The Committee's campaign statement also did not disclose the name, street address, occupation,  
12    and employer name for Mr. Caballero.

13           32.     By failing to disclose on the pre-election statement for the period ending on May 19,  
14    2012, the total amount of contributions received during the statement period from persons who  
15    contributed \$100 or more, and the date and amount of the contributions and name, address, occupation,  
16    and employer for Ms. Salazar, Ms. Grajeda, Mr. Sarkissian, Ms. Chang, and Mr. Caballero, the  
17    Committee and Roybal violated section 84211, subdivisions (c) and (f).

18                                   **Count 2**

19                   **Failure to Disclose Contributions of \$100 or more on a Pre-election Statement**

20           33.     Complainant incorporates paragraphs 1 – 32 of this Accusation, as though completely set  
21    forth herein.

22           34.     Roybal and the Committee had a duty to disclose, on the Committee's semi-annual  
23    campaign statement for the period ending on June 30, 2012, the total amount of contributions received  
24    during the period from persons who contributed \$100 or more, as well as the name, street address,  
25    occupation, employer name, date, and cumulative amount of contributions for each person who  
26    contributed \$100 or more to the Committee during the statement period.

1 35. The Committee received a contribution of \$400 from James Ciampa on or about May 29,  
2 2012. The Committee did not disclose receiving this contribution on its campaign statement for this  
3 period. The Committee's campaign statement also did not disclose the name, street address, occupation,  
4 and employer name for Mr. Ciampa.

5 36. By failing to disclose on the semi-annual campaign statement for the period ending on  
6 June 30, 2012, the total amount of contributions received during the statement period from persons who  
7 contributed \$100 or more, and the date and amount of the contribution, and name, address, occupation,  
8 and employer for Mr. Ciampa, the Committee and Roybal violated section 84211, subdivisions (c) and  
9 (f).

10 **Count 3**

11 **Failure to Disclose Contributions of \$100 or more on a Semi-annual Statement**

12 37. Complainant incorporates paragraphs 1 – 36 of this Accusation, as though completely set  
13 forth herein.

14 38. Roybal and the Committee had a duty to disclose, on the Committee's semi-annual  
15 campaign statement for the period ending on December 31, 2012, the total amount of contributions  
16 received during the period from persons who contributed \$100 or more, as well as the name, street  
17 address, occupation, employer name, date, and cumulative amount of contributions for each person who  
18 contributed \$100 or more to the Committee during the statement period.

19 39. The Committee received a contribution of \$250 from Golden State Advocacy on or about  
20 July 30, 2012. The Committee did not disclose receiving this contribution on its campaign statement for  
21 this period. The Committee's campaign statement also did not disclose the name and street address for  
22 Golden State Advocacy.

23 40. The Committee received a contribution of \$250 from Romejan, Inc. on or about July 30,  
24 2012. The Committee did not disclose receiving this contribution on its campaign statement for this  
25 period. The Committee's campaign statement also did not disclose the name and street address for  
26 Romejan, Inc.

1           41.    The Committee received a contribution of \$500 from Southwest Management  
2 Consultants on or about July 30, 2012. The Committee did not disclose receiving this contribution on its  
3 campaign statement for this period. The Committee's campaign statement also did not disclose the name  
4 and street address for Southwest Management Consultants.

5           42.    The Committee received a contribution of \$100 from Antonio Mendoza. The Committee  
6 did not disclose receiving this contribution on its campaign statement for this period. The Committee's  
7 campaign statement also did not disclose the name, street address, occupation, and employer name for  
8 Mr. Mendoza.

9           43.    The Committee received a contribution of \$250 from Davenport Management, Inc. on or  
10 about July 30, 2012. The Committee did not disclose receiving this contribution on its campaign  
11 statement for this period. The Committee's campaign statement also did not disclose the name and street  
12 address for Davenport Management, Inc.

13           44.    The Committee received a contribution of \$400 from Model City Democratic Club on or  
14 about July 30, 2012. The Committee did not disclose receiving this contribution on its campaign  
15 statement for this period. The Committee's campaign statement also did not disclose the name and  
16 street address for Model City Democratic Club.

17           45.    By failing to disclose on the semi-annual campaign statement for the period ending on  
18 December 31, 2012, the total amount of contributions received during the statement period from persons  
19 who contributed \$100 or more, and the date and amount of the contribution, and name and address for  
20 Golden State Advocacy, Romejan, Inc., Southwest Management Consultants, Davenport Management,  
21 Inc., and Model City Democratic Club, and name, address, occupation, and employer for Mr. Mendoza,  
22 the Committee and Roybal violated section 84211, subdivisions (c) and (f).

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1 AGGRAVATING FACTORS

2 46. Roybal, who remains in office, failed to identify a total of twelve contributors who gave  
3 \$100 or more to the Committee in 2012. These contributions totaled \$3,350, which equates to  
4 approximately 15% of his reported contributions for that year.

5 47. Instead of reporting the contributions discussed in Counts 1 through 3 above as  
6 contributions of \$100 or more and identifying the contributors, Roybal intentionally misreported the  
7 money as contributions of less than \$100 so as to avoid itemizing the contributions and disclosing the  
8 sources of the contributions.

9 MITIGATING FACTORS

10 48. None.

11 PRAYER

12 WHEREFORE, Complainant prays as follows:

13 1. That the Fair Political Practices Commission hold a hearing pursuant to section 83116  
14 and regulation 18361.5, and at such hearing find that Roybal and the Committee violated the Act as  
15 alleged herein;

16 2. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),  
17 order Roybal and the Committee to pay a monetary penalty of at least One Thousand Dollars (\$1,000)  
18 and not more than Five Thousand Dollars (\$5,000) for the violations of the Act alleged in **Count 1**;

19 3. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),  
20 order Roybal and the Committee to pay a monetary penalty of at least One Thousand Dollars (\$1,000)  
21 and not more than Five Thousand Dollars (\$5,000) for the violations of the Act alleged in **Count 2**;


22 4. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),  
23 order Roybal and the Committee to pay a monetary penalty of at least One Thousand Dollars (\$1,000)  
24 and not more than Five Thousand Dollars (\$5,000) for the violations of the Act alleged in **Count 3**;

25 5. That the Fair Political Practices Commission, pursuant to regulation 18361.5, subdivision  
26 (d), consider the following factors in framing a proposed order following a finding of a violation  
27 pursuant to Section 83116: (1) the seriousness of the violation; (2) the presence or absence of any

1 intention to conceal, deceive or mislead; (3) whether the violation was deliberate, negligent or  
2 inadvertent; (4) whether the violator demonstrated good faith by consulting the Commission staff or any  
3 other government agency in a manner not constituting a complete defense under section 83114(b); (5)  
4 whether the violation was isolated or part of a pattern and whether the violator has a prior record of  
5 violations of the Act or similar laws; and (6) whether the violator, upon learning of a reporting violation,  
6 voluntarily filed amendments to provide full disclosure.

7 6. That the Fair Political Practices Commission grant such other and further relief as it  
8 deems just and proper.

9  
10 Dated: 14 April 16

11 Respectfully Submitted,  
12 **FAIR POLITICAL PRACTICES COMMISSION**  
13   
14 Galena West  
15 Enforcement Chief  
16 Enforcement Division  
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