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8
9 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

10 **STATE OF CALIFORNIA**

11 In the Matter of:

FPPC Case No. 18/1145

12 **TRANSPARENT SILICON VALLEY**
13 **AND VICTOR GOMEZ,**

STIPULATION, DECISION AND ORDER

14 Respondents.
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17 **INTRODUCTION**

18 Respondent, Transparent Silicon Valley (the “Committee”) (ID# 1401777), is a state general
19 purpose committee. According to the Committee’s statement of organization, the Committee was
20 formed to “make contributions to local and state candidates for elected office and initiatives in multiple
21 counties, the Committee is not politically affiliated.” At all relevant times, Respondent, Victor Gomez
22 (“Gomez”), served as the Committee’s treasurer.

23 The Political Reform Act (the “Act”)¹ requires committees and treasurers to file certain
24 campaign statements and reports to disclose contributions received and expenditures made. The
25 Committee and Gomez violated the Act by failing to timely file certain campaign statements and reports.
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27 ¹ The Political Reform Act – sometimes simply referred to as the Act – is contained in Government Code sections
28 81000 through 91014. All statutory references are to this code. 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
this source.

1 **SUMMARY OF THE LAW**

2 The Act and its regulations are amended from time to time. The violations in this case occurred
3 in 2018 and 2019. For this reason, all legal references and discussions of law pertain to the Act’s
4 provisions as they existed at that time.

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

6 When enacting the Act, the people of California found and declared that previous laws regulating
7 political practices suffered from inadequate enforcement by state and local authorities.² Thus, it was
8 decreed the Act “should be liberally construed to accomplish its purposes.³ A central purpose of the Act
9 is to promote transparency by ensuring that receipts and expenditures in election campaigns are fully
10 and truthfully disclosed so that voters are fully informed and improper practices are inhibited.⁴ Another
11 purpose of the Act is to provide adequate enforcement mechanisms so that the Act will be “vigorously
12 enforced.”⁵

13 **Campaign Reports and Statements; Where to File**

14 State general purpose committees are required to file campaign statements with the Secretary of
15 State.⁶ State general purpose committees must file campaign statements, in paper format, with the
16 Secretary of State if it has not met the \$25,000 threshold of contributions received or expenditures
17 made.⁷ If the committee has received contributions or made expenditures exceeding \$25,000 then the
18 committee must file electronically with the Secretary of State as well as in paper format.⁸

19 **Pre-Election Campaign Statements**

20 A state general purpose committee shall file the applicable pre-election campaign statements if it
21 makes contributions or independent expenditures totaling \$500 or more in connection with the statewide
22 primary or general election during the period covered by the pre-election campaign statements.⁹

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25 ² Section 81001, subdivision (h).

26 ³ Section 81003.

27 ⁴ Section 81002, subdivision (a).

28 ⁵ Section 81002, subdivision (f).

⁶ Section 84215.

⁷ Section 84605.

⁸ *Id.*

⁹ Section 84200.5, subdivision (c).

1 The first pre-election campaign statement, for the period ending 45 days before the election, shall
2 be filed no later than 40 days before the election.¹⁰ The second pre-election campaign statement, for the
3 period ending 17 days before the election, shall be filed no later than 12 days before the election.¹¹

4 **24-Hour Reports**

5 A “late contribution” is a contribution that totals in the aggregate \$1,000 or more and is made to
6 a candidate, a controlled committee, or a committee formed or existing primarily to support or oppose a
7 candidate or measure during the 90-day period preceding the date of the election, at which the candidate
8 or measure is to be voted on.¹² Each committee that makes a late contribution shall report the late
9 contribution within 24 hours of the time it is made.¹³

10 A “late independent expenditure” is an independent expenditure that totals in the aggregate
11 \$1,000 or more and is made for or against a specific candidate or measure involved in an election during
12 the 90-day period preceding the date of the election or on the date of the election.¹⁴ A committee that
13 makes a late independent expenditure shall report the late independent expenditure within 24 hours of
14 the time it is made.¹⁵

15 **Semi-Annual Campaign Statements**

16 Recipient committees shall file semi-annual campaign statements each year no later than July 31
17 for the period ending June 30, and no later than January 31 for the period ending December 31.¹⁶

18 **Joint and Several Liability of Committee and Treasurer**

19 It is the duty of a committee treasurer to ensure the committee complies with the Act.¹⁷ A
20 treasurer may be held jointly and severally liable, along with the committee and candidate, for violations
21 committed by the committee.¹⁸

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25 ¹⁰ Section 84200.8, subdivision (a).

¹¹ Section 84200.8, subdivision (b).

26 ¹² Section 82036, subdivision (a).

¹³ Section 84203, subdivisions (a)-(b).

27 ¹⁴ Section 82036.5.

¹⁵ Section 84204.

¹⁶ Section 84200.

28 ¹⁷ Sections 81004, 84100, and Regulation 18427.

¹⁸ Sections 83116. 5 and 91006.

1 **Liability for Violations**

2 Any person who violates any provision of the Act, who purposely or negligently causes any
3 other person to violate any provision of the Act, or who aids and abets any other person in the violation
4 of any provision of the Act, is liable for administrative penalties up to \$5,000 per violation.¹⁹

5 **SUMMARY OF THE FACTS**

6 This case was opened as a result of an anonymous complaint alleging the Committee had not
7 reported certain independent expenditures. After requesting the Committee’s filing history, the
8 Enforcement Division discovered other reporting deficiencies that were later corrected in amended
9 statements filed in conjunction with this settlement.

10 On April 9, 2018, the Committee and Gomez timely filed a qualifying statement of organization
11 reporting the Committee qualified as a committee on March 30, 2018. The Committee’s campaign
12 statements reported the Committee received approximately \$40,649 in contributions and paid
13 approximately \$38,111 on expenditures between January 1, 2018 and June 30, 2019. To date, the
14 Committee has not been terminated.

15 **JUNE 5, 2018, PRIMARY ELECTION**

16 **Failure to Timely File Two Pre-Election Campaign Statements**

17 The Committee reported making contributions and/or independent expenditures totaling \$500 or
18 more in connection with the June 5, 2018, primary election, during both periods covered by the pre-
19 election campaign statements. Thus, the Committee was required to file pre-election campaign
20 statements as follows:

STATEMENT	REPORTING PERIOD	DUE DATE
First Pre-Election	01/01/2018 – 04/21/2018	04/26/2018
Second Pre-Election	04/22/2018 – 05/19/2018	05/24/2018

24 On July 30, 2018, the Committee and Gomez timely filed a semi-annual campaign statement for
25 the reporting period of January 1, 2018 through June 30, 2018. This statement reported \$22,350 received
26 in contributions and \$13,479 spent on expenditures.

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¹⁹ Sections 83116 and 83116. 5.

1 On October 30, 2018, the Committee and Gomez filed the first pre-election campaign statement
2 for the correct reporting period. This statement reported \$5,850 received in contributions and \$2,031
3 spent on expenditures. The same information was reported on the Committee's semi-annual campaign
4 statement filed on July 30, 2018. Thus, the Committee and Gomez were 95 days late in reporting its
5 campaign activity during the first pre-election reporting period (07/30/2018 – 04/26/2018 = 95 days).

6 On October 30, 2018, the Committee and Gomes filed the second pre-election campaign
7 statement for the correct reporting period. This statement reported \$16,500 received in contributions and
8 \$11,448 spent on expenditures. Again, this information was reported on the Committee's semi-annual
9 campaign statement filed on July 30, 2018. Thus, the Committee and Gomez were 67 days late in
10 reporting its campaign activity during the second pre-election reporting period (07/30/2018 –
11 05/24/2018 = 67 days).

12 **Failure to File Four 24-Hour Reports**

13 The 90-day period preceding the June 5, 2018, primary election, began on March 7, 2018 and
14 ended on June 5, 2018. The Committee was required to file 24-hour reports within 24 hours of making a
15 late contribution or late independent expenditure that totals in the aggregate \$1,000 or more. The
16 Committee's campaign statements revealed late contributions and late independent expenditures that
17 required 24-hour reports.

18 On April 3, 2018, the Committee reported, on its first pre-election campaign statement, making a
19 \$1,000 contribution to Residents in Support of Measure C (ID# 1404319). The Committee did not file a
20 24-hour contribution report for this late contribution.

21 On April 16, 2018, the Committee reported, on its first pre-election campaign statement, making
22 another \$1,000 contribution to Residents in Support of Measure C. The Committee did not file a 24-hour
23 contribution report for this late contribution.

24 On May 11, 2018, the Committee reported, on its second pre-election campaign statement,
25 making a \$3,667.32 independent expenditure to support Richard Perez for Supervisor 2018
26 (ID#1405843). The Committee did not file a 24-hour independent expenditure report for this late
27 independent expenditure.

1 On May 15, 2018, the Committee reported, on its second pre-election campaign statement,
2 making a \$5,200 contribution to Residents in Support of Measure C. The Committee did not file a 24-
3 hour contribution report for this late contribution.

4 In summary, the Committee and Gomez did not file four 24-hour reports for the following late
5 contributions and late independent expenditure made prior to the June 5, 2018, primary election:

DATE	COMMITTEE	CONTRIBUTION OR INDEPENDENT EXPENDITURE?	AMOUNT
04/03/2018	Residents in Support of Measure C	Contribution	\$1,000
04/16/2018	Residents in Support of Measure C	Contribution	\$1,000
05/11/2018	Richard Perez for Supervisor 2018	Independent Expenditure	\$3,667.32
05/15/2018	Residents in Support of Measure C	Contribution	\$5,200
		TOTAL:	\$10,867.32

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12 **NOVEMBER 6, 2018, GENERAL ELECTION**

13 **Failure to Timely File Two Pre-Election Campaign Statements**

14 The Committee reported making contributions and/or independent expenditures totaling \$500 or
15 more in connection with the November 6, 2018, general election, during both periods covered by the
16 pre-election campaign statements. Thus, the Committee was required to file pre-election campaign
17 statements as follows:

STATEMENT	REPORTING PERIOD	DUE DATE
First Pre-Election	07/01/2018 – 09/22/2018	09/27/2018
Second Pre-Election	09/23/2018 – 10/20/2018	10/25/2018

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21 On April 16, 2019, 201 days late, the Committee and Gomez filed, in paper format, the first pre-
22 election campaign statement for the correct reporting period. This statement reported \$1,299 received in
23 contributions and \$5,783 spent on expenditures. On October 31, 2018, 34 days late, the Committee and
24 Gomez electronically filed the first pre-election campaign statement. The Committee had not yet
25 reached the \$25,000 threshold and so was not required to file this statement electronically.

26 On April 18, 2019, 175 days late, the Committee and Gomez filed, in paper format, the second
27 pre-election campaign statement for the correct reporting period. This statement reported \$4,000
28 received in contributions and \$4,157 spent on expenditures. Since the Committee reached the \$25,000

1 threshold during this reporting period, the Committee was required to file this statement, and all
 2 subsequent statements, electronically as well as in paper format. On November 4, 2018, 10 days late, the
 3 Committee and Gomez electronically filed the second pre-election campaign statement.

4 **Failure to File Four 24-Hour Reports**

5 The 90-day period preceding the November 6, 2018, general election, began on August 8, 2018
 6 and ended on November 6, 2018. The Committee’s campaign statements revealed late contributions and
 7 late independent expenditures that required 24-hour reports. The Committee and Gomez filed five 24-
 8 hour contribution reports prior to the November 6, 2018, general election. These five filed reports were
 9 not required to be filed as the late contributions did not meet the \$1,000 threshold or were not made to or
 10 received by a candidate, a controlled committee, or a committee formed or existing primary to support
 11 or oppose a candidate or measure.

12 The Committee and Gomez reported, on its first pre-election campaign statement, making
 13 independent expenditures to support Peter Hernandez for San Benito County Supervisor District 3 –
 14 2018 (ID# 1404041).

DATE OF INDEPENDENT EXPENDITURE	DESCRIPTION	AMOUNT	CUMULATIVE
08/13/2018	Voter Guide Slate Cards	\$750	\$750
08/15/2018	Budget Watchdogs Slate Cards	\$167	\$917
08/15/2018	Election Digest Slate Cards	\$149	\$1,066

19 The Committee and Gomez were required to file a 24-hour independent expenditure report by
 20 August 16, 2018 after reaching the \$1,000 threshold on August 15, 2018. The Committee did not file a
 21 24-hour independent expenditure report for these late independent expenditures.

22 The Committee and Gomez reported, on its first pre-election campaign statement, making
 23 independent expenditures to support Gordon Machado for Mayor 2018 (ID# 1407954).

DATE OF INDEPENDENT EXPENDITURE	DESCRIPTION	AMOUNT	CUMULATIVE
09/13/2018	COPS Voter Guide	\$605	\$605
09/14/2018	Voter Guide Slate Cards	\$750	\$1,355

1 The Committee and Gomez were required to file a 24-hour independent expenditure report by
 2 September 15, 2018 after reaching the \$1,000 threshold on September 14, 2018. The Committee did not
 3 file a 24-hour independent expenditure report for these late independent expenditures.

4 On October 25, 2018, the Committee and Gomez reported, on its semi-annual campaign
 5 statement, making a \$1,000 contribution to Susan Ellenberg for Santa Clara Supervisor 2018 (ID#
 6 1394541). The Committee did not file a 24-hour contribution report for this late contribution.

7 On November 6, 2018, the Committee and Gomez reported, on its semi-annual campaign
 8 statement, making a \$3,000 contribution to Gordon Machado for Mayor 2018. The Committee did not
 9 file a 24-hour contribution report for this late contribution.

10 In summary, the Committee and Gomez did not file four 24-hour reports for the following late
 11 contributions and late independent expenditures made prior to the November 6, 2018, general election:

DATE	COMMITTEE	CONTRIBUTION OR INDEPENDENT EXPENDITURE?	AMOUNT
08/15/2018	Peter Hernandez for San Benito County Supervisor District 3 - 2018	Independent Expenditure	\$1,066
09/14/2018	Gordon Machado for Mayor 2018	Independent Expenditure	\$1,355
10/25/2018	Susan Ellenberg for Santa Clara Supervisor 2018	Contribution	\$1,000
11/06/2018	Gordon Machado for Mayor 2018	Contribution	\$3,000
		TOTAL:	\$6,421

19 **Failure to Timely File Two Semi-Annual Campaign Statements**

20 Following the November 6, 2018, general election, semi-annual campaign statements were due
 21 as follows:

STATEMENT	REPORTING PERIOD	DUE DATE
Semi-Annual	10/21/2018 – 12/31/2018	01/31/2019
Semi-Annual	01/01/2019 – 06/30/2019	07/31/2019

25 On August 23, 2019, 204 days late, the Committee and Gomez filed, in paper format, the semi-
 26 annual campaign statement for the reporting period of October 21, 2018 through December 31, 2018.
 27 This statement reported \$12,000 received in contributions and \$10,621 spent on expenditures. On April
 28

1 18, 2019, 77 days late, the Committee and Gomez electronically filed this semi-annual campaign
2 statement.

3 The Committee and Gomez did not file, in paper format, the semi-annual campaign statement for
4 the reporting period of January 1, 2019 through June 30, 2019. On July 29, 2019, the Committee and
5 Gomez timely filed this statement electronically. This semi-annual campaign statement reported \$1,000
6 received in contributions and \$4,071 spent on expenditures.

7 For purposes of settlement, the violations for failing to timely file semi-annual campaign
8 statements for the reporting periods ending on December 31, 2018 and June 30, 2019 are not being
9 charged separately. The Committee and Gomez paid a total of \$2,810 in late filing penalties to the
10 Secretary of State for the semi-annual campaign statements for the reporting period ending December
11 31, 2018.

12 VIOLATIONS

13 **Count 1: Failure to Timely File Two Pre-Election Campaign Statements**

14 The Committee and Gomez failed to timely file pre-election campaign statements for the
15 reporting periods ending on April 21, 2018 and May 19, 2018, in violation of Government Code Section
16 84200.5, subdivision (c).

17 **Count 2: Failure to File Four 24-Hour Reports**

18 Prior to the June 5, 2018, primary election, the Committee and Gomez failed to file four 24-hour
19 reports for contributions made totaling \$7,200 and for an independent expenditure made totaling
20 \$3,667.32, in violation of Government Code Sections 84203 and 84204.

21 **Count 3: Failure to Timely File Two Pre-Election Campaign Statements**

22 The Committee and Gomez failed to timely file pre-election campaign statements for the
23 reporting periods ending September 22, 2018 and October 20, 2018, in violation of Government Code
24 Section 84200.5, subdivision (c).

25 **Count 4: Failure to File Four 24-Hour Reports**

26 Prior to the November 6, 2018, general election, the Committee and Gomez failed to file four 24-
27 hour reports for contributions made totaling \$4,000 and for independent expenditures made totaling
28 \$2,421, in violation of Government Code Sections 84203 and 84204.

1 **PROPOSED PENALTY**

2 This matter consists of four counts. The maximum penalty that may be imposed is \$5,000 per
3 count. Thus, the maximum penalty that may be imposed here is \$20,000.²⁰

4 In determining the appropriate penalty for a particular violation of the Act, the Commission
5 considers the facts of the case, the public harm involved, and the purposes of the Act. Further, the
6 Commission considers factors such as: (a) the seriousness of the violation; (b) the presence or absence of
7 any intention to conceal, deceive or mislead; (c) whether the violation was deliberate, negligent or
8 inadvertent; (d) whether the violation was isolated or part of a pattern; (e) whether corrective
9 amendments voluntarily were filed to provide full disclosure; and (f) whether the violator has a prior
10 record of violations.²¹

11 The public harm inherent in campaign reporting violations is that the public is deprived of
12 important, time-sensitive information regarding campaign activity. Generally, these types of violations
13 are considered more serious when the public is deprived of information that was required to be disclosed
14 prior to an election because this has the potential to affect how votes are cast. Another factor that
15 influences the seriousness of the violation is whether the public harm was mitigated because some of the
16 reportable activity was disclosed, prior to the election. Here, the Committee and Gomez’s failure to file
17 campaign statements and reports prior to the June 5, 2018, primary election, was a serious violation as
18 100% of the Committee’s campaign activity was not disclosed until nearly two months after the election.
19 The seriousness of the Committee and Gomez’s failure to timely file campaign statements and reports
20 prior to the November 6, 2018, general election, is mitigated due to campaign statements being
21 electronically filed prior to the election. Although, these campaign statements were filed just days before
22 the pertinent election.

23 In this case, there was no evidence to support an intent to conceal, deceive or mislead the public
24 as to the Committee’s receipts and expenditures. However, the violations appear to be negligent as
25 Gomez is sophisticated with the Act and was previously a candidate for County Supervisor in the 2014
26 primary and general elections. Thus, Gomez knew or should have known of the required filing schedule
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28 ²⁰ Section 83116, subdivision (c).

²¹ Regulation 18361. 5, subdivision (d).

1 for campaign reports. The violations committed here were isolated as the Committee and Gomez have
2 not had prior enforcement history.

3 The Commission considers penalties in prior cases with the same or similar violations and
4 comparable facts.

5 *In the Matter of Los Angeles League of Conservation Voters*; FPPC No. 16/19925. Respondents,
6 a county general purpose committee and its treasurer, failed to timely file two pre-election statements
7 prior to the June 7, 2016 election (Count 1), two pre-election statements prior to the November 8, 2016
8 election (Count 2), three semi-annual campaign statements (Count 3), and twenty 24-hour reports
9 (Counts 4 and 5). Due to the committee's campaign activity prior to the elections, Respondents had an
10 obligation to file 24-hour reports and pre-election campaign statements prior to two elections. The pre-
11 election statements and 24-hour reports were not filed until after the pertinent election following contact
12 from the Enforcement Division. Respondents campaign activity between January 1, 2016 and June 30,
13 2017 totaled \$95,471 in contributions received and \$106,507 in expenditures made. On December 20,
14 2018, the Commission approved a total penalty of \$13,500; \$3,000 for Count 1, \$3,000 for Count 2,
15 \$2,500 for Count 3, \$2,500 for Count 4, and \$2,500 for Count 5.

16 A lesser penalty than that approved in the *Los Angeles League* case is recommended. Like *Los*
17 *Angeles League*, the Committee and Gomez failed to timely file various campaign statements including
18 two pre-election campaign statements prior to the primary election (Count 1), eight 24-hour reports
19 (Counts 2 and 4), and two pre-election campaign statements prior to the general election (Count 3).
20 Unlike *Los Angeles League*, the Committee and Gomez raised only \$40,649 in contributions,
21 approximately 42% of that raised by *Los Angeles League*, and spent only \$38,111 on expenditures,
22 approximately 36% of that spent by *Los Angeles League*. Therefore, a total penalty amount of \$9,000 is
23 recommended; \$2,500 for Count 1; \$2,000 for Count 2; \$2,500 for Count 3; and \$2,000 for Count 4.

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1 Under these circumstances, it is respectfully submitted that imposition of an agreed upon penalty
2 in the amount of \$9,000 is justified, as reflected in the chart below:

Count	Violation	Penalty
1	Failure to Timely File Two Pre-Election Campaign Statements	\$2,500
2	Failure to File Four 24-Hour Reports	\$2,000
3	Failure to Timely File Two Pre-Election Campaign Statements	\$2,500
4	Failure to File Four 24-Hour Reports	\$2,000
	TOTAL:	\$9,000

9 CONCLUSION

10 Complainant, the Enforcement Division of the Fair Political Practices Commission, and
11 Respondents, Transparent Silicon Valley and Victor Gomez hereby agree as follows:

- 12 1. Respondents violated the Act as described in the foregoing pages, which are a true and accurate
13 summary of the facts in this matter.
- 14 2. This stipulation will be submitted for consideration by the Fair Political Practices Commission at
15 its next regularly scheduled meeting – or as soon thereafter as the matter may be heard.
- 16 3. This stipulation resolves all factual and legal issues raised in this matter – for the purpose
17 of reaching a final disposition without the necessity of holding an administrative hearing to
18 determine the liability of Respondents pursuant to Section 83116.
- 19 4. Respondents understand, and hereby knowingly and voluntarily waive, any and all
20 procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through
21 18361.9. This includes, but is not limited to the right to appear personally at any administrative
22 hearing held in this matter, to be represented by an attorney at Respondents’ own expense, to
23 confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to
24 testify at the hearing, to have an impartial administrative law judge preside over the hearing as a
25 hearing officer, and to have the matter judicially reviewed.
- 26 5. Respondents agree to the issuance of the decision and orders set forth below. Also,
27 Respondents agree to the Commission imposing against them an administrative penalty in the
28 amount of \$9,000. One or more cashier’s checks or money orders totaling said amount – to be

1 paid to the General Fund of the State of California – is/are submitted with this stipulation as full
2 payment of the administrative penalty described above, and same shall be held by the State of
3 California until the Commission issues its decision and order regarding this matter.

4 6. If the Commission refuses to approve this stipulation – then this stipulation shall become
5 null and void, and within fifteen business days after the Commission meeting at which the
6 stipulation is rejected, all payments tendered by Respondents in connection with this stipulation
7 shall be reimbursed to Respondents. If this stipulation is not approved by the Commission, and if
8 a full evidentiary hearing before the Commission becomes necessary, neither any member of the
9 Commission, nor the Executive Director, shall be disqualified because of prior consideration of
10 this stipulation.

11 7. The parties to this agreement may execute their respective signature pages separately. A
12 copy of any party’s executed signature page, including a hardcopy of a signature page
13 transmitted via fax or as a PDF email attachment, is as effective and binding as the original.
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16 Dated: _____

Galena West, Chief of Enforcement
Fair Political Practices Commission

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19 Dated: _____

Victor Gomez, individually and on behalf of
Transparent Silicon Valley,
Respondents

1 The foregoing stipulation of the parties “In the Matter of Transparent Silicon Valley and Victor
2 Gomez,” FPPC Case No. 18/1145, is hereby accepted as the final decision and order of the Fair Political
3 Practices Commission, effective upon execution by the Chair.

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5 IT IS SO ORDERED.

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7 Dated: _____
8 Richard C. Miadich, Chair
9 Fair Political Practices Commission
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