



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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EXECUTIVE STAFF REPORTS

June 13, 2019 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: GALENA WEST, CHIEF OF ENFORCEMENT

I. Overview

During the period of May 1, 2019 through May 31, 2019 the Enforcement Division received 51 complaints, opened 7 for investigation, and rejected 26. The Enforcement Division received 89 late filer referrals during this time. During this time, the Enforcement Division closed a total of 124 cases including:

- 44 warning letters - campaign violations (15), lobbying violations (2), advertisement violations (1), and statement of economic interests violations (26);
- 2 advisory letters for an advertisement violation and a statement of economic interests violation;
- 30 no action closure letters alleging - campaign violations (11), statement of economic interests violations (16), advertisement violations (1), conflict of interests violations (1), and lobbying violations (1);
- 38 approved stipulations at the May Commission meeting and;
- 10 committees were administratively terminated.

The Division had 1571 cases in various stages of resolution at the time of the May Monthly Report and currently has approximately 1544 cases in various stages of resolution, including the 27 cases before the Commission as listed in the June 2019 Agenda.

On May 1, 2015, the Division received from the Secretary of State's office 2,460 \$50 Annual Fee referrals for 2013 fees not paid timely. Of those, 6 remain pending. On October 22, 2015, the Division received the \$50 Annual Fee referrals for 2014, which totaled 1,786. Of those, 12 remain pending. We are receiving 2015, 2016, 2017, and 2018 referrals periodically through the Electronic Complaint System.

II. Annual Statistics

On the next page, you will find a chart that details the annual statistics for enforcement complaints, referrals and cases. This chart includes the data from 2018, where consistent with other years, 966 cases were closed with violations found. The penalties collected decreased as the emphasis on providing warnings increased. The information in the chart has been gathered from public reports, information from the defunct and inactive database, and data that has been converted into current form, so the numbers are close estimates in some instances.

	Year	2015	2016	2017	2018
1	Complaints Received	609	1,180	564	1,352
2	Referrals Received	596	350	1,616	1,529
3	Total Complaint and Referrals Received	1,205	1,530	2,180	2,881
4	Cases opened	2,273 ¹	1,315	1,480	1,561
5	Cases closed	1,253	1,803	1,477	1,243
6	Cases with resolutions approved by the Commission ²	333	311	340	235
	a Streamline cases approved by Commission	258	234	262	173
	b Mainline cases approved by Commission	69	70	66	56
	c Default cases approved by Commission	6	7	12	6
7	Total fines imposed by the Commission	\$703,821	\$894,257	\$1,126,933	\$499,606
8	Warning letters issued	442	489	505	554
9	Administrative terminations	116	668	297	177
10	Cases closed with violations found ³	891	1,468	1,142	966
11	Advisory letters issued	19	14	17	20
12	No action closure letters	343	321	318	252

¹ In 2015, the Enforcement Division received information regarding 2,460 \$50 Annual Fee non-payors in May and another 1,786 in October of that year. None of these came through the typical “referral” process and had to be evaluated for: whether the committee had been terminated locally or with SOS, whether the committee never qualified, whether the fees were paid prior to the referral, and whether records existed to evaluate the committee, before the information could be opened into a case. Therefore, these do not appear in the Referral line since they did not follow that process.

² Total for lines 6a, 6b, and 6c.

³ Total for lines 6, 8, and 9.

III. Unexecuted Streamline Stipulations

Streamline penalty stipulations are approved by the Chief of Enforcement and reported to the Commission for discussion only before they are executed. The following streamline stipulations are presented for that purpose. After the close of the hearing, the Chief of Enforcement may execute all or any of the streamline penalty stipulations, at her discretion per Regulation 18360.2.

Recordkeeping

[In the Matter of Javier Perez for Judge 2016, Javier Perez, and David Gould; FPPC No. 18/1439.](#)

Staff: Chief of Enforcement Galena West and Staff Services Analyst Shaina Elkin. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Javier Perez was an unsuccessful candidate for Los Angeles County Superior Judge in the November 8, 2016 General Election. Javier Perez for Judge 2016 was his candidate-controlled committee. David Gould was the Committee's treasurer during relevant times. The Committee, Perez, and Gould failed to maintain records verifying the source of a cash deposit made into the candidate's bank account, in violation of Government Code Section 84104 (1 count). **Total Proposed Penalty: \$200.**

Advertisements

[In the Matter of Stop Taxing Our Property, A Committee Against Measure P and Jennifer W. Zeiter; FPPC No. 18/1560.](#)

Staff: Commission Counsel Megan A. Van Arsdale. Stop Taxing Our Property, A Committee Against Measure P is a local primarily formed committee. Jennifer W. Zeiter is the Committee's principal officer and treasurer. The Committee and Zeiter failed to include the proper advertisement disclaimers on yard signs distributed by the committee prior to the November 6, 2018 General Election, in violation of Government Code Section 84502 (1 count). **Total Proposed Penalty: \$123.**

[In the Matter of Roberto Plamenco for Oak Grove School District Board, T5, 2018 and Roberto Plamenco; FPPC No. 18/1031.](#)

Staff: Senior Commission Counsel Chris Burton, Special Investigator Roone Petersen, and Commission Counsel Megan A. Van Arsdale. Roberto Plamenco was an unsuccessful candidate for Oak Grove School District Board of Trustees in the November 6, 2018 General Election. Roberto Plamenco for Oak Grove School District Board, T5, 2018 is his candidate-controlled committee. The Committee and Plamenco failed to include the proper advertisement disclaimers on mailers distributed by the committee prior to the November 6, 2018 General Election, in violation of Government Code Section 84305 (1 count). **Total Proposed Penalty: \$113.**

[In the Matter of Gennawey for Laguna Niguel Council 2018 and Elaine Gennawey; FPPC No. 18/1485.](#)

Staff: Commission Counsel Megan A. Van Arsdale. Elaine Gennawey was a successful candidate for re-election to Laguna Niguel City Council in the November 6, 2018 General Election. Elaine Gennawey for Laguna Niguel Council 2018 is her candidate-controlled committee. The Committee and Gennawey failed to include the proper advertisement disclaimers on a mass email distributed by the committee prior to the November 6, 2018 General Election, in violation of Government Code Section 84305 (1 count). **Total Proposed Penalty: \$100.**

Campaign Late Filer

[In the Matter of Southwest Teachers Association PAC and Michelle Gates; FPPC No. 18/1051.](#) Staff: Chief of Enforcement Galena West and Associate Governmental Program Analyst Dominika Wojenska. Southwest Teachers Association PAC is a local general purpose committee. Michelle Gates is the Committee's treasurer. The Committee and Gates failed to timely file three 24-Hour Reports, in violation of Government Code Section 84204 (3 counts). **Total Proposed Penalty: \$651**

[In the Matter of Committee to Elect Gracie Torres Director VMWD II 2018, Gracie Torres, and Ron Hope; FPPC No. 19/027.](#) Staff: Chief of Enforcement Galena West and Associate Governmental Program Analyst Dominika Wojenska. Gracie Torres was a successful candidate for Western Municipal Water District Director in the November 6, 2018 General Election. Committee to Elect Gracie Torres Director VMWD II 2018 is her candidate-controlled committee. Ron Hope is the Committee's treasurer. The Committee, Torres, and Hope failed to timely file two pre-election campaign statements for the reporting periods of July 1, 2018 through September 22, 2018 and September 23, 2018 through October 20, 2018, in violation of Government Code Section 84200.5 (2 counts). **Total Proposed Penalty: \$586.**

[In the Matter of Hesperia Teacher's Association PAC and James Fogo; FPPC No. 18/1041.](#) Staff: Chief of Enforcement Galena West and Political Reform Consultant Chloe Hackert. Hesperia Teacher's Association PAC is a local general purpose committee. James Fogo is the Committee's treasurer. The Committee and Fogo failed to timely file a pre-election campaign statement for the reporting period of July 1, 2018 through September 22, 2018, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$480.**

[In the Matter of Associated Chino Teachers \(A.C.T.\) PAC; FPPC No. 18/1040.](#) Staff: Chief of Enforcement Galena West and Political Reform Consultant Chloe Hackert. Associated Chino Teachers (A.C.T.) PAC is a local general purpose committee. The Committee failed to timely file a pre-election campaign statement for the reporting period of July 1, 2018 through September 22, 2018, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$457.**

[In the Matter of Louis Dominguez for State Senate 2014, Louis Dominguez, and Suzanne Dominguez; FPPC No. 16/15632.](#) Staff: Commission Counsel Jenna Rinehart. Louis Dominguez was an unsuccessful candidate for Senate in the December 9, 2014 Special Election. Louis Dominguez for State Senate 2014 was his candidate-controlled committee. Suzanne Dominguez was the Committee's treasurer. The Committee, Dominguez, and Dominguez failed to timely file two semiannual campaign statements for the reporting periods of January 1, 2015 through June 30, 2015 and July 1, 2015 through December 31, 2015, in violation of Government Code Section 84200 (2 counts). **Total Proposed Penalty: \$452.**

[In the Matter of Friends of Tzeitel Paras-Caracci for Duarte City Council 2018, Tzeitel Paras-Caracci, and Russel M. Paras; FPPC No. 19/421.](#) Staff: Chief of Enforcement Galena West and Political Reform Consultant Ginny Lambing. Tzeitel Paras-Caracci was a successful candidate for Duarte City Council in the November 6, 2018 General Election. Friends of Tzeitel Paras-Caracci for Duarte City Council 2018 is her candidate-controlled committee. Russel M. Paras is the Committee's treasurer. The Committee, Paras-Caracci, and Paras failed to timely file a 24-Hour Report, in violation of Government Code Section 84203 (1 count). **Total Proposed Penalty: \$244.**

[In the Matter of Contra Costa Young Democrats and Jerome Pandell; FPPC No. 16/759.](#) Staff: Commission Counsel Ruth Yang and Special Investigator Garrett Micheels. Contra Costa Young Democrats is a local general purpose committee. Jerome Pandell is the Committee's treasurer. The Committee and Pandell failed to timely file a 24-Hour Report, in violation of Government Code Section 84203 (1 count). **Total Proposed Penalty: \$210.**

Statement of Economic Interests Late Filer

[In the Matter of Alvin Velasquez; FPPC No. 16/19750.](#) Staff: Commission Counsel Ruth Yang and Associate Governmental Program Analyst Dominika Wojenska. Alvin Velasquez, a Water and Sewage Plant Supervisor with the California Department of Parks and Recreation, failed to timely file a 2015 and 2016 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Proposed Penalty: \$1,600.**

[In the Matter of Marcel Weiland; FPPC No. 19/486.](#) Staff: Chief of Enforcement Galena West and Staff Services Analyst Cheng Saetern. Marcel Weiland, a former Planning Commissioner for the City of Citrus Heights, failed to timely file a 2017 and 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count); and failed to timely file a Leaving Office Statement of Economic Interests, in violation of Government Code Section 87204 (1 count). **Total Proposed Penalty: \$400.**

[In the Matter of Ronald Russak; FPPC No. 19/212.](#) Staff: Chief of Enforcement Galena West and Political Reform Consultant Chloe Hackert. Ronald Russak, a Senior Landscape Architect with the California Department of Transportation, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

[In the Matter of Kenneth Arnold; FPPC No. 19/465.](#) Staff: Chief of Enforcement Galena West and Staff Services Analyst Cheng Saetern. Kenneth Arnold, a Planning Commissioner for the City of Santa Fe Springs, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Proposed Penalty: \$200.**

[In the Matter of Bruce Delgado; FPPC No. 19/436.](#) Staff: Chief of Enforcement Galena West and Political Reform Consultant Chloe Hackert. Bruce Delgado, Mayor of the City of Marina, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Proposed Penalty: \$200.**

[In the Matter of Kelly Krueger; FPPC No. 18/672.](#) Staff: Commission Counsel Jenna Rinehart. Kelly Krueger, a Clinical Psychologist with California Correctional Health Care Services, failed to timely file a 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

[In the Matter of Norman Gonsalves; FPPC No. 17/1025.](#) Staff: Chief of Enforcement Galena West and Intake Manager Tara Stock. Norman Gonsalves, a Senior Transportation Engineer with the California Department of Transportation, failed to timely file a 2016 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

[In the Matter of Damon Sandoval; FPPC No. 17/967.](#) Staff: Commission Counsel Jenna Rinehart. Damon Sandoval, a member of the Transportation Committee for the Southern California Association of Governments, failed to timely file a 2016 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$200.**

Statement of Economic Interests Late Reporter

[In the Matter of Marina Khubesrian; FPPC No. 19/420.](#) Staff: Chief of Enforcement Galena West and Intake Manager Tara Stock. Marina Khubesrian, Mayor of the City of South Pasadena, failed to timely disclose her home office business on her 2017 and 2018 Annual Statements of Economic Interests, in violation of Government Code Section 87206 (2 counts). **Total Proposed Penalty: \$200.**

[In the Matter of Elena Adams; FPPC No. 16/19832.](#) Staff: Chief of Enforcement Galena West and Intake Manager Tara Stock. Elena Adams, a Trustee for the Grossmont-Cuyamaca Community College District, failed to timely disclose spousal income on her 2017 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$100.**

II. LEGAL DIVISION

STAFF:

DAVID BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

California State Association of Counties and California School Boards Association v. FPPC
Los Angeles County Superior Court, Central District, Case No. BS174653

On September 11, 2018, petitioners served a first amended petition for writ of mandate and complaint for declaratory relief. Petitioners allege that Regulations 18420.1 and 18901.1 are invalid as a matter of law, that the Commission has exceeded its jurisdiction in adopting these Regulations, and that the Regulations are unenforceable.

The Attorney General's Office is representing the Commission and timely filed an answer to the petition/complaint. On March 4, 2019, the Commission filed a Motion for Judgment on the Pleadings.

On March 29, 2019, the Commission's Motion for Judgment on the Pleadings was granted with leave to amend. The court vacated all hearing dates and set a new trial setting conference. Pursuant to the parties' stipulation, plaintiffs must file an amended petition/complaint on or before June 27, 2019, and the trial setting conference is July 26, 2019, at 9:30 a.m.

Howard Jarvis Taxpayers Association, et al. v. Edmund Brown, et al.
Court of Appeal, Third Appellate District, Case No. C086334

On December 12, 2016, the Howard Jarvis Taxpayers Association and retired State Senator and Judge Quentin L. Kopp filed a lawsuit against Governor Brown and the Commission to invalidate a new law that would allow public funds to be used for political campaigning. In September of 2016, the Governor signed Senate Bill 1107 which authorizes the use of public funds to finance campaigns if a jurisdiction adopts a law or ordinance creating a public financing program. Plaintiffs allege the new law improperly eliminates the prohibition against public financing of campaigns, implemented pursuant to Proposition 73 in 1988, because it was done without voter approval. In addition, plaintiffs allege that the new law violates the Political Reform Act because it does not "further the purposes of the Act," an express requirement in the Act for legislative amendment. The Attorney General's Office is representing both Governor Brown and the Commission in this litigation. A hearing was held in Superior Court on August 4, 2017. After taking the matter under submission, the Court issued a Ruling, dated August 23, 2017, "entering a judgment declaring that the amendments made to Government Code section 85300 by Senate Bill No. 1107 are void and have no legal effect; and an injunction restraining Respondents from enforcing the unconstitutional amendments made by Senate Bill No. 1107."

In closed session at its meeting on September 21, 2017, the Commission voted to appeal the Superior Court decision. The Notice of Appeal was filed with the Third District Court of Appeal on January 9, 2018. Appellants' Opening Brief was timely filed on September 21, 2018. Respondents' Brief was timely filed on December 10, 2018. Appellants' Reply Brief was timely filed on March 1, 2019. All appellate briefs are submitted. Further action on this matter will be determined by the court's order, most likely to set a date for oral argument.

Frank J. Burgess v. Fair Political Practices Commission
Riverside County Superior Court, Case No. RIC 1510656

After prevailing on the Commission's appeal of plaintiff's motion for attorney's fees at trial, plaintiff Frank J. Burgess filed a motion for attorney's fees and costs on appeal. After briefing by the parties, the court issued a tentative ruling reducing the claimed fees and costs on appeal by approximately \$5,000. The parties did not request a hearing and the tentative became the court's order. Rather than pursue its Motion to Tax Costs, the Commission stipulated with plaintiff to the amount awarded by the court on plaintiff's motion.

Active litigation of the case is concluded, but the Commission is now in the process of procuring payment of the judgment for plaintiff. This process can take multiple months.

B. Outreach and Training

- Political Reform Consultant Alex Castillo delivered a filing officer workshop to approximately 50 clerks in Olympic Valley.
- Video Tutorials: Commission video tutorials were accessed a total of 319 times in May; Form 700 videos were viewed 229 times, the Candidate/Treasurer video was viewed 64 times, and the filing officer videos were viewed 26 times.
- Filing Schedules: Education Program Staff created 1 filing schedule for a local election in Loomis.

C. Advice

In May 2019, the Legal Division responded to the following requests for advice:

- **Education Program:** The Education Program responded to 399 requests for technical assistance via phone.
- **Requests for Advice:** Legal Division Political Reform Consultants and attorneys collectively responded to more than 445 e-mail and telephone requests for advice, 16 of which were not responded to within 24 hours.
- **Advice Letters:** The Legal Division received 18 new advice letter requests under the Political Reform Act and completed 23 letters.

- **Section 1090 Letters:** The Legal Division received 6 advice letter requests concerning Section 1090 and completed 7 letters. This year to date, we have received 35 advice requests regarding Section 1090.

D. Miscellaneous Decisions

None to report.

E. Potential Upcoming Regulations

July 18th, 2019

- Regulation 18422: Multipurpose Organization Record Keeping. (Prenotice Discussion.)
- Regulation 18702.1: Conflict of Interest Analysis, Business Entity Materiality Threshold. (Adoption.)
- Regulation 18702.3: Conflict of Interest Analysis, Source of Income Materiality Threshold. (Adoption.)

August 15th, 2019

- Regulation 18419: Sponsored Committee Rules including (1) Time Periods for Analyzing Whether a Committee Qualified as Sponsored, (2) Naming Requirements, and (3) Harmonizing with Section 84222. (Prenotice Discussion.)

September 19th, 2019

- Disclose Act Related Regulation Package. (Prenotice Discussion.)
- Regulation 18422: Multipurpose Organization Record Keeping. (Adoption.)

F. Conflict of Interest Codes

Adoptions and Amendments

State Agency Conflict of Interest Codes

- CA Gambling Control Commission
- Department of Rehabilitation

Multi-County Agency Conflict of Interest Codes

- Association of CA Water Agencies Joint Powers Insurance Authority
- Fairfield-Suisun Unified School District
- Inland Empire Health Plan Joint Powers Authority
- Inland Empire Health Plan Health Access

- Mother Lode Job Training Agency
- Northern CA Energy Authority
- River Delta Joint Unified School District
- San Joaquin Valley Air Pollution Control District
- Sites Joint Powers Authority
- Yucaipa Calimesa Joint Unified School District

Exemptions

None to report.

Extensions

None to report.

G. Probable Cause Hearings

Please note, a finding of probable cause does not constitute a finding that a violation has occurred. The respondents are presumed to be innocent of any violation of the Act unless a violation is proven in a subsequent proceeding.

The following matters were decided based solely on the papers. The respondents did not request a probable cause hearing.

1. ***In the Matter of Dan Medina for Gardena Mayor 2017, Dan Medina, and Susana Weltz Medina, FPPC No. 15/2256.*** On May 6, 2019, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: The Committee, Medina, and Weltz Medina failed to timely pay the 2014 annual fee by the January 15, 2014 due date and failed to pay a penalty of \$150 for failing to timely pay the annual fee, in violation of Section 84101.5, subdivisions (c) and (d).

Count 2: The Committee, Medina, and Weltz Medina failed to timely pay the 2016 annual fee by the January 15, 2016 due date and failed to pay a penalty of \$150 for failing to timely pay the annual fee, in violation of Section 84101.5, subdivisions (c) and (d).

Count 3: The Committee, Medina, and Weltz Medina failed to timely pay the 2017 annual fee by the January 15, 2017 due date and failed to pay a penalty of \$150 for failing to timely pay the annual fee, in violation of Section 84101.5, subdivisions (c) and (d).

Count 4: The Committee, Medina, and Weltz Medina failed to timely pay the 2018 annual fee by the January 15, 2018 due date and failed to pay a penalty of \$150 for failing to timely pay the annual fee, in violation of Section 84101.5, subdivisions (c) and (d).

- Count 5: The Committee, Medina, and Wertz Medina failed to timely pay the 2019 annual fee by the January 15, 2019 due date and failed to pay a penalty of \$150 for failing to timely pay the annual fee, in violation of Section 84101.5, subdivisions (c) and (d).
- Count 6: The Committee, Medina, and Wertz Medina failed to timely file a semiannual campaign statement for the reporting period of January 1, 2015 through June 30, 2015 by the deadline of July 31, 2015 in violation of Section 84200.
- Count 7: The Committee, Medina, and Wertz Medina failed to timely file a semiannual campaign statement for the reporting period of July 1, 2015 through December 31, 2015 by the deadline of February 1, 2016 in violation of Section 84200.
- Count 8: The Committee, Medina, and Wertz Medina failed to timely file a semiannual campaign statement for the reporting period of January 1, 2016 through June 30, 2016 by the deadline of August 1, 2016 in violation of Section 84200.
- Count 9: The Committee, Medina, and Wertz Medina failed to timely file a semiannual campaign statement for the reporting period of July 1, 2016 through December 31, 2016 by the deadline of January 31, 2017 in violation of Section 84200.
- Count 10: The Committee, Medina, and Wertz Medina failed to timely file a pre-election campaign statement for the reporting period of January 1, 2017 through January 21, 2017 by the deadline of January 26, 2017 in violation of Sections 84200.5 and 84200.8.
- Count 11: The Committee, Medina, and Wertz Medina failed to timely file a pre-election campaign statement for the reporting period of January 22, 2017 through February 18, 2017 by the deadline of February 23, 2017 in violation of Sections 84200.5 and 84200.8.
- Count 12: The Committee, Medina, and Wertz Medina failed to timely file a semiannual campaign statement for the reporting period of February 19, 2017 through June 30, 2017 by the deadline of July 31, 2017 in violation of Section 84200.
- Count 13: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report for a late contribution of \$2,973 received on or around December 23, 2016 and due on December 24, 2016 in violation of Section 84203.
- Count 14: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report for a late contribution of \$1,000 received on or around December 29, 2016 and due on December 30, 2016 in violation of Section 84203.
- Count 15: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report for a late contribution of \$1,000 received on or around January 3, 2017 and due on January 4, 2017 in violation of Section 84203.

- Count 16: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report for a late contribution of \$1,000 received on or around January 12, 2017 and due on January 13, 2017 in violation of Section 84203.
- Count 17: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report for a late contribution of \$1,000 received on or around January 18, 2017 and due on January 19, 2017 in violation of Section 84203.
- Count 18: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report for three late contributions totaling \$3,000 received on or around February 3, 2017 and due on February 4, 2017 in violation of Section 84203.
- Count 19: The Committee, Medina, and Wertz Medina failed to timely file a 24-hour contribution report two late contributions totaling \$2,000 received on or around February 13, 2017 and due on February 14, 2017 in violation of Section 84203.
- Count 20: The Committee, Medina, and Wertz Medina failed to report all required information for \$800 in contributions on a campaign statement over the period of July 1, 2016 through December 31, 2016 in violation of Section 84211, subdivision (f).
- Count 21: The Committee, Medina, and Wertz Medina failed to report all required information for \$120 in expenditures on a campaign statement over the period of January 1, 2017 through January 21, 2017 in violation of Section 84211, subdivision (k).
- Count 22: The Committee, Medina, and Wertz Medina failed to report all required information for \$1,200 in contributions on a campaign statement over the period of January 22, 2017 through February 18, 2017 in violation of Section 84211, subdivision (f).
- Count 23: The Committee, Medina, and Wertz Medina failed to report all required information for \$350 in contributions and \$1,220 in expenditures on a campaign statement over the period of February 19, 2017 through June 30, 2017 in violation of Section 84211, subdivision (f) and (k).
- Count 24: The Committee, Medina, and Wertz Medina failed to report all required information for \$960 in expenditures on a campaign statement over the period of July 1, 2017 through December 31, 2017 in violation of Section 84211, subdivision (k).
- Count 25: The Committee, Medina, and Wertz Medina accepted approximately four cash contributions in amounts over \$100 for a total of \$520 and made approximately six different cash expenditures for a total of \$1,960 in 2016 and 2017 in violation of Section 84300.
- Count 26: The Committee, Medina, and Wertz Medina failed to maintain adequate source documentation for contributions and expenditures in 2016 and 2017 in violation of Section 84104 and Regulation 18401.

2. ***In the Matter of Stella Bratsis, FPPC No. 2016-20052.*** On May 31, 2019, probable cause was found to believe Respondent committed the following violations of the Act:

Count 1: Bratsis failed to timely file a 2015 Annual SEI by April 1, 2016, in violation of Sections 87300 and 87302, subdivision (b); and Regulation 18730, subdivision (b)(5)(C).

Count 2: Bratsis failed to timely file a 2016 Annual SEI by April 3, 2017, in violation of Sections 87300 and 87302, subdivision (b); and Regulation 18730, subdivision (b)(5)(C).