EXECUTIVE STAFF REPORTS

September 18, 2025, Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: KENDALL L.D. BONEBRAKE, CHIEF OF ENFORCEMENT

A. Overview

During the period of August 1, 2025, through August 31, 2025, the Enforcement Division received the following complaints and referrals:

Sworn		Non-Sworn	Anonymous	Referrals	
Number Received	36	16	31	147	

The number of complaints received by the Enforcement Division in August increased compared with the previous month, while the number of referrals received by the Enforcement Division decreased.

For the month of August, more time to respond beyond the 14-day statutory period was needed for approximately 14 sworn complaints. Generally, additional time to respond was utilized in order to give respondents more time to respond to inquiries when it was requested.

Additionally, for the month of August, the Enforcement Division opened 85 cases, rejected 70 complaints and referrals, and closed a total of 97 cases including:

- 56 warning letters –statement of economic interests violations (43), campaign violations (6), behested payment violations (2), agency conflict of interest code violations (1), gift-over-the-limit violations (2), and lobbying violations (2);
- 18 no action closure letters: PREP completed statement of economic interests violations (16) and campaign violations (2);
- 4 no action closure letters alleging campaign violations (3) and statement of economic interests violations (1);
- 12 approved stipulations from the August Commission meeting;
- 7 administrative terminations;

The Division had a total of 908 cases in various stages of resolution at the time of the August Monthly Report and currently has approximately 896 cases in various stages of resolution, including the 9 streamline, 3 mainline, and 1 default cases before the Commission as listed in the September Agenda. Net case closings since the last monthly report totaled 12.

B. Annual Statistics

The following is a chart that details the annual statistics for enforcement complaints, referrals and cases over the past six years. The statistics show a marked increase in complaints during election years while referrals were reduced in 2024.

	Y	ear	2019	2020	2021	2022	2023	2024
1		omplaints eceived	744	1,390	606	1,379	653	1,456
2		eferrals eceived	1,950	1,518	1,751	1,724	1,971	1,393
3	Co Re	otal omplaint and eferrals eceived	2,694	2,908	2,357	3,103	2,624	2,849
4	Са	ises opened	1,820	1,155	1,185	990	831	1,403
5	Ca	ases closed ³	1,465	1,526	1,058	1,075	1,295	1,536
6		ases with nalties ¹	343	278	269	161	98	149
	a	Streamline cases	263	194	234	142	79	117
	b	Mainline cases	73	77	32	14	17	25
	С	Default cases	7	7	3	5	2	7
7		otal fines aposed	\$797,384	\$1,940,107	\$472,248	\$617,548	\$376,531	\$802,238
8		arning ters issued	584	777	475	681	813	847
9		dministrative minations	104	62	59	53	87	80

¹ Total for lines 6a, 6b, and 6c.

10	wi	nses closed th violations und ²	1,031	1,117	803	895	998	1,076
11		lvisory ters issued	9	7	16	8	15	12
12		o action osure letters	423	402	237	217	296	469
	a	PREP Completed				39	86	261

C. 2024-2025 Quarterly Caseload Summary

The following is a chart that compares the number of cases from given years at the end of each quarter during 2024 and 2025. Enforcement has successfully focused on the resolution of older cases.

	June 2024	September 2024	December 2024	March 2025	June 2025	Difference in Existing Caseload Overall
2018	8	8	5	3	1	-7
2019	22	21	12	11	8	-14
2020	103	84	40	24	14	-89
2021	124	105	68	54	42	-82
2022	191	165	131	119	104	-87
2023	260	236	194	171	154	-106
2024				318	295	-23

D. Presentations

On August 28, 2025, Supervising Special Investigators Jeffrey Kamigaki and Lance Hachigian participated in a presentation for the Council on Governmental Ethics Laws (COGEL) entitled, "Make it Make Sense: Effective Report Writing," which covered the best practices for writing clear and effective investigative reports.

² Total for lines 6, 8, and 9.

³ Total cases closed includes Commission approved cases from the previous year and Commission approved administrative judgements. It does not include Commission approved cases not yet closed.

On August 22, 2025, Chair Adam Silver, Assistant Chief Counsel Sukhi Brar, and Intake Manager Tara Stock presented to the California Political Treasurers Association in Long Beach.

E. 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 the Chief's discretion per Regulation 18360.3.

Since the last Monthly Report, the Enforcement Chief has not used discretion to increase the penalties for Tier Two advertising violations resulting in public confusion, under Regulation 18360.1(e)(6)(C)(ii), or to increase the penalties for Tier Two violations involving the same candidate, committee, or principal officer who has paid a Tier One penalty to the Commission or received a Warning Letter from the Commission for the same type of violation occurring within the last five years, based on the resulting public harm.

Advertisements

In the Matter of Edward "Ty" Peabody; FPPC No. 24/641. Staff: Christopher B. Burton, Assistant Chief of Enforcement. Edward "Ty" Peabody, as a former City Councilmember of the City of Indian Wells, failed to include the proper disclosures on a mass electronic mailing, in violation of Government Code Section 84305 (1 count). Total Penalty: \$200 (Tier One).

Lobbying Reporting

In the Matter of Pebble Beach Caddie Liaison Board and Michael Lehotta; FPPC No. 25/889. Staff: Chance Felkins, Commission Counsel. The respondents were represented by Sara Lang of Bell McAndrews & Hiltachk, LLP. Pebble Beach Caddie Liaison Board is a Lobbyist Employer and was registered to lobby for the 2019-2020 legislative session. Pebble Beach Caddie Liaison Board failed to timely file two lobbyist employer reports, in violation of Government Code Section 86117 (2 counts). Total Penalty: \$1,800 (Tier Two).

In the Matter of Mars, Incorporated and Peter Rowan; FPPC No. 25/965. Staff: Chance Felkins, Commission Counsel. The respondents were represented by Caroline Kilvein of Political Solution LLC. Mars, Incorporated is a Lobbyist Employer and was registered to lobby for the 2019-2020 legislative session. Mars, Incorporated failed to timely file one lobbyist employer report, in violation of Government Code Section 86117 (1 count). Total Penalty: \$533 (Tier One).

Campaign Late Filer/Reporter

In the Matter of Roseville Secondary Educators Association Political Action Committee, Aaron Weidkamp, and Marie Criste; FPPC No. 24/1017. Staff: Jaleena Evans, Commission Counsel. Roseville Secondary Educators Association Political Action Committee is a county

general purpose committee. Aaron Weidkamp previously served as the Committee's treasurer and Marie Criste is the current treasurer. The Committee and its treasurers failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts), failed to timely file four semiannual campaign statements, in violation of Government Code Section 84200 (4 counts), and failed to timely file five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts). **Total Penalty: \$3,483 (Tiers One and Two).**

In the Matter of Abundant Housing LA, a non-profit 501(c)(4); FPPC No. 21/500. Staff: Neal Bucknell, Senior Commission Counsel and Lance Hachigian, Supervising Special Investigator. The Respondent is represented by Emily Andrews of Olson Remcho LLP. Abundant Housing LA is a multi-purpose organization that qualified as a local general purpose committee. The Committee failed to timely file a statement of organization to report its date of qualification, in violation of Government Code Sections 84101 and 84222, subdivision (e) (1 count); and failed to timely file a semiannual campaign statement, in violation of Government Code Sections 84200 and 84222, subdivision (e) (1 count). Total Penalty: \$502 (Tier One).

Statement of Economic Interests Late Filer/Reporter

In the Matter of Carey Klingfus; FPPC No. 21/906. Staff: Neal Bucknell, Senior Commission Counsel and Katelin Angeloni, Special Investigator. Carey Klingfus, as a member of the La Habra Heights City Council, failed to timely report income on the 2020 Annual, 2021 Annual, and Leaving Office Statements of Economic Interest, in violation of Government Code Sections 87203, 87204, and 87207 (3 counts). Total Penalty: \$1,800 (Tier Two).

In the Matter of Marcus Robinson; FPPC No. 24/381. Staff: Angela J. Brereton, Assistant Chief of Enforcement and Joselyne Soto, Associate Governmental Program Analyst. Marcus Robinson, Planning Commissioner for the City of Montague Planning Commission and current Chairman for the City of Montague Planning Commission, failed to timely file the 2022, 2023 and 2024 Annual Statements of Economic Interests, in violation of Government Code Sections 87200 and 87203 (3 counts). Total Penalty: \$800 (Tier One).

In the Matter of Steven Mescher; FPPC No. 24/785. Staff: Angela J. Brereton, Assistant Chief of Enforcement and Shaina Elkin, Associate Governmental Program Analyst. Steven Mescher, as Planning Commissioner for the City of Marysville, failed to timely file their Assuming Office, 2022 Annual, 2023 Annual, and Leaving Office Statements of Economic Interest, in violation of Government Code Sections 87202 and 87203 (4 counts). Total Penalty \$600 (Tier One).

In the Matter of Stevenson Kiang; FPPC No. 24/1013. Staff: Kristin E. Goulet, Commission Counsel. Stevenson Kiang, an Attorney III for the Department of Financial Protection and Innovation, failed to timely file the 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). Total Penalty: \$200 (Tier One).

II. AUDITS & ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF OF AUDITS & ASSISTANCE

Audits are conducted per Government Code sections 90000 - 90008 of the Political Reform Act (the Act). The Act requires full disclosure of receipts and expenditures of candidates and committees and disclosure of the finances of lobbyists. The purpose of the audits is to determine the level of compliance of the auditees with the Act. The opinions expressed in the audit report reflect the level of compliance with the Act. The FPPC is not responsible for the contents of the candidate's documents. Audit reports are then submitted to the Enforcement Division for further review.

A. Overview

The audit reports prepared by the FPPC summarize findings with respect to the filer's conformity with the disclosure and recordkeeping requirements of the Political Reform Act. Copies of audit reports are always sent to the auditees and those included in the audit report (such as the prior treasurer, current treasurer, and/or their representatives). These reports are public documents.

B. Current Period Updates

During the period August 1, 2025, to August 31, 2025, the Audits and Assistance Division adopted one audit report, with findings. Currently, the team has 50 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit report adopted are as follows:

- Manyel for State Board of Equalization District 3, 2022 (ID # 1455656)
 - o Finding 1: Late Filing of Forms 501-Candidate Intention Statement A Form 501 Candidate Intention Statement was not filed with the Secretary of State prior to receipt of \$3,000 in funds from the candidate on May 10, 2022. The initial Form 501, which was due on May 10, 2022, was not filed until July 26, 2022, 77 days late and after the Primary Election. Additionally, the statement filed on July 26, 2022, was incomplete, and a corrected amendment was not filed until October 6, 2022, 149 days after the original due date.
 - Finding 2: Late Filing of Forms 410 Statement of Organization and Termination

A Form 410 Statement of Organization was not filed with the Secretary of State within 10 days of qualifying as a committee, as required. The initial Form 410, which was due on May 20, 2022, was not filed until October 17, 2022 150 days late and after the Primary Election.

In addition, Form 410 Statements of Termination were filed on September 5, 2023, and again on November 6, 2023, both listing a termination date of October 27, 2022. However, the committee was not effectively terminated until March 2, 2023, when the campaign bank account was closed and the balance reduced to zero.

Finding 3: Forms 460 Campaign Disclosure Statements Not Timely Filed
The Committee did not file Form 460 Campaign Disclosure Statements for the
periods ending May 21, 2022, June 30, 2022, September 24, 2022, October 22, 2022,
December 31, 2022, and March 2, 2023 with the Secretary of State. Instead, the
Committee filed a Form 460 Termination Statement on August 31, 2023, only
covering the campaign activity from May 11, 2022 to October 27, 2022. This filing
was between 212 and 462 days late, depending on the specific reporting period.
Receipts and expenditures reported for the covered periods totaled \$4,053 and \$1,902,
respectively.

In addition, an amended Form 460 Campaign Disclosure Statement was filed on November 6, 2023, 67 days after the original filing, to correct errors in the Summary Page for the reporting period of May 11, 2022, through October 27, 2022. The amendment revised the beginning cash balance, which was incorrectly reported as \$2,000 on the original statement filed August 31, 2023. The correct beginning balance should have been zero. The total contributions received were also adjusted from \$3,532 to \$4,053. However, the amounts disclosed as contributions received on Schedule A remained unchanged between the original and amended statements.

o Finding 4: Form 497 Contribution Report Not Filed

A Form 497 Contribution Report, required within 24 hours, was not filed with the Secretary of State for a \$3,000 contribution received from the candidate on May 10, 2022. The \$3,000 contribution was also incorrectly reported as \$2,000 received on May 11 and \$1,000 received on May 12, 2022. No additional Form 497 reports were required.

o Finding 5: Funds Not Disclosed and Records Not Maintained

Funds totaling \$1,133 deposited into the campaign bank account were not disclosed on the Form 460 Campaign Disclosure Statement filed by the Committee on November 6, 2023. Additionally, records verifying the source of \$4,922 in deposits into the campaign bank account were not maintained.

Of the \$4,922 deposited, \$1,357 was processed through PayPal and WinRed before being transferred into the campaign bank account. However, due to incomplete records, it could not be determined whether additional contributions or other funds were received through these platforms and were not disclosed or deposited into the campaign bank account.

o Finding 6: Contribution Received in Cash

A \$1,000 contribution reported as received from the candidate was made in cash.

Finding 7: Expenditures Made Not Disclosed and Records Not Maintained Expenditures made totaling \$4,013 were not disclosed on the Form 460 Campaign Disclosure Statement filed by the Committee. Additionally, supporting invoices and/or receipts for expenditures made totaling \$3,615 were not maintained. Bank statements and a canceled check were maintained to verify the payee names, dates, and amounts paid.

Furthermore, campaign expenditures totaling \$863 were not initially processed through the Committee's designated campaign bank account. Instead, these payments were made using a PayPal account and a Zelle account and were later reimbursed from the campaign account. The candidate provided PayPal transaction information only for the period of May 11, 2022, through May 27, 2022, and did not provide requested documentation for the Zelle payments. Due to the incomplete records, it could not be determined whether additional campaign expenditures were made through these accounts and not disclosed. However, bank statements were maintained to verify the dates, amounts, and reimbursements to PayPal and Zelle.

- o Finding 8: Funds Transferred to an Unidentified Bank Account On March 2, 2023, \$501 was transferred from the campaign bank account to an unidentified account in order to close the campaign bank account.
- o Finding 9: Occupation/Employer Verification Records Not Maintained Contributions totaling \$4,053 were reported as received, including \$3,000 from the candidate. Documentation was not maintained to verify the occupation and/or employer information for contributions received totaling \$950 reported from five individuals.

C. Public Draw

A public draw was held on August 27, 2025, to select local jurisdictions and superior court offices. The results of the drawing are posted on the draw webpage at https://www.fppc.ca.gov/transparency/audit-program/drawing-schedule---results.html.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None.

B. Outreach and Training

Webinars & Workshops

- August 6, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Stephen Hernandez and Alexandra Miner presented. 32 people attended.
- August 15, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Alexandra Miner and Kathryn Ito presented. 29 people attended.
- August 19, the FPPC presented a General Purpose Committee webinar requested by the California Democratic Party Region 3. Political Reform Consultants Stephen Hernandez and Alexandra Miner presented. 34 people attended.
- August 22, the FPPC presented a Statement of Economic Interests Filing Officer webinar requested by Yolo County. Political Reform Consultant Kathryn Ito and Telephone Advice & Education Outreach Manager Vanessa Manriquez, presented. 3 people attended.
- August 22, Chair Adam Silver, Asst. Chief Counsel Sukhi Brar, and Enforcement Intake Manager Tara Stock attended the California Political Treasurers Association meeting in Long Beach and provided an update on the Political Reform Act and the FPPC.
- August 26, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Kathryn Ito and Stephen Hernandez presented. 25 people attended.

Scheduled Webinars

- September 11, the FPPC is presenting a Completing Campaign Forms 460/497 webinar.
- September 17, the FPPC is presenting a Campaign/Treasurer webinar.
- September 23, the FPPC is presenting a Campaign Filing Officer webinar.

Video Tutorials: Commission video tutorials were accessed a total of 267 times in August. Form 700 videos were accessed 132 times, the Candidate/Treasurer video was accessed 71 times, and the filing officer videos were accessed 64 times.

C. New and Updated Educational Resources

• Updated <u>Statement of Economic Interests E-Filing Fast Fact Sheet</u>

D. Political Reform Education Program (PREP):

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments
Statement of Economic Interests Course	27	18	2	40
Campaign Course for Local Candidates and Candidate-Controlled Committees	7	4	0	9
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0
Advertisement Course for Candidates and Candidate-Controlled Committees	0	0	0	0

E. Advice

The <u>August Advice Letter Report</u> is available on the FPPC website at https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports.html.

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

- *Telephone*: The Education unit responded to 255 requests for technical assistance via telephone.
- *Email Advice:* Political Reform Consultants and Legal Division attorneys collectively responded to 472 email requests for advice, 347 of which were responded to within 24 hours and 390 were responded to within 48 hours.
- *PRA Advice Letters:* The Legal Division received 7 advice letter requests under the Political Reform Act and completed 3.
- **Section 1090 Letters:** The Legal Division received 3 advice letter requests concerning Section 1090 and completed 4.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

October

Probable cause proceedings – Amend the existing PC regulation to make the process more efficient and lessen unnecessary delays in conducting probable cause proceedings. (Pre-notice)

Committee termination and reopening procedures – Amend Regulations 18404 and 18404.1 to clarify committee termination procedures and adopt new Regulation 18404.3 to clarify committee reopening procedures as well as to address the termination/reopening procedures related to the return or reimbursement of a security system or item paid for with campaign funds required by AB 2041. (Adoption)

November

Notice of attribution of contributions – New provision requiring a candidate-controlled committee that transfers funds to another committee subject to attribution requirements to provide notice to the contributor to whom a contribution was attributed. (Adoption)

January

Enforcement penalties – Amend "streamline" regulations to clarify Enforcement's discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced penalty, require the Commission to directly approve streamline fines, and consider existing inclusions and exclusion criteria. (Pre-notice)

Probable cause proceedings – Amend the existing PC regulation to make the process more efficient and lessen unnecessary delays in conducting probable cause proceedings. (Adoption)

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

- Law Revision Commission
- Department of Veterans Affairs
- Business, Consumer Services, and Housing Agency

Multi-County Agencies

• Mojave Desert Air Quality Management District

- Coachella Valley Water District
- San Luis Obispo County Community College District
- Eastern Sierra Council of Governments
- John Adams Academies, Inc.
- School and College Legal Services of California
- Sonoma Clean Power Authority
- Pacific Library Partnership
- El Rico Groundwater Sustainability Agency
- Sacramento Municipal Utility District (SMUD)
- Aspire Public Schools
- Stockton East Water District
- Citrus Heights Water District

Repeals

• Civil Rights Council

Exemptions

None

Extensions

None

I. Probable Cause Proceedings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause exists when the evidence supports a reasonable belief or strong suspicion that a violation occurred, but does not constitute a finding a violation occurred. Respondents are presumed innocent of any violation of the Act until a violation is proven in a subsequent proceeding.

In the Matter of Jose Ramirez (aka Jose Manny Ramirez), Case No. 2024-00744. On August 11, probable cause was found, on the papers submitted, to believe that Respondent Jose Ramirez committed the following violations of the Act:

Counts 1-3: Ramirez failed to timely file Assuming Office SEIs by February 6, 2023, as an alternate board member at the Fresno County Council of Governments, the Fresno County Rural Transit Agency, and the Fresno County Regional Transportation Mitigation Fee Agency, respectively, in violation of Government Code section 87300.

Counts 4-6: Ramirez failed to timely file 2023 Annual SEIs by April 2, 2024, as an alternate board member at the Fresno County Council of Governments, the Fresno County Rural Transit Agency, and the Fresno County Regional Transportation Mitigation Fee Agency, respectively, in violation of Government Code section 87300.

Counts 7-9: Ramirez failed to timely file a 2024 Annual/Leaving Office SEI by February 18, 2025, as an alternate board member at the Fresno County Council of Governments, the Fresno County Rural Transit Agency, and the Fresno County Regional Transportation Mitigation Fee Agency, respectively, in violation of Government Code section 87300.

In the Matter of Robert Sharffenberg, Case No. 2024-00787. On August 11, 2025, probable cause was found, on the papers, that Respondent committed the following violations of the Act:

Count 1: Scharffenberg failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.

<u>Count 2</u>: Scharffenberg failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.

<u>Count 3</u>: Scharffenberg failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

Count 4: Scharffenberg failed to timely file a 2024 Annual SEI by the April 1, 2025, due date, in violation of Government Code Section 87300.

In the Matter of Mike Peck, Case No. 2024-00456. On August 12, 2025, probable cause was found, on the papers submitted, that Respondent Mike Peck ("Peck") committed the following violations of the Act:

Count 1: Peck failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87203

Count 2: Peck failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87203.

Count 3: Peck failed to timely file a 2024 Annual SEI by the April 1, 2025 due date, in violation of Government Code Section 87203.

In the Matter of Blanca Gomez California State Assembly District 33 2020, Blanca Gomez for Victorville City Council 2020, Blanca Gomez for Senate District 23 2024, Blanca Gomez San Bernardino County Assessor-Recorder 2024, Blanca Gomez Victorville City Council 2024, Blanca Gomez, Dolores Armstead, and Jasmyne Robinson, Case No. 2021-00288. On August 14, probable cause was found, on the papers submitted, to believe that Respondents committed the following violations of the Act:

The Assembly Committee and Gomez

Count 1: The Assembly Committee and Gomez failed to timely file a semi-annual campaign statement with the Secretary of State for the reporting period of February 16, 2020 through June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Sections 84200 and 84215.

Count 2: The Assembly Committee and Gomez failed to timely report an in-kind contribution, in the form of signs, from the Victorville Committee, in violation of Government Code Section 84211.

<u>Count 3</u>: The Assembly Committee and Gomez improperly terminated the Committee by making an expenditure after termination, in violation of Section 84214 and Regulation 18404.

The 2020 Victorville Committee, Gomez, and Robinson

Count 4: The 2020 Victorville Committee, Gomez, and Robinson failed to accurately report contributions on the pre-election campaign statement for the reporting period of July 1, 2020 through September 19, 2020, in violation of Government Code Section 84211.

Count 5: The 2020 Victorville Committee, Gomez, and Robinson failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 through June 30, 2020, by the July 31, 2020 due date, in violation of Government Code Section 84200.

Count 6: The 2020 Victorville Committee, Gomez, and Robinson received a prohibited cash contribution of \$100 or more which was deposited into the campaign bank account on August 5, 2020, in violation of Government Code Section 84300, subdivision (a).

Count 7: The 2020 Victorville Committee, Gomez, and Robinson received a prohibited cash contribution(s) of \$100 or more, which was deposited into the campaign bank account on October 13, 2020, in violation of Government Code Section 84300, subdivision (a).

Count 8: The 2020 Victorville Committee, Gomez, and Robinson made a prohibited cash withdrawal of \$4,000 from the campaign bank account on October 13, 2020, in violation of Government Code Section 84300, subdivision (b).

Count 9: The 2020 Victorville Committee, Gomez, and Robinson received a prohibited cash contribution(s) of \$100 or more, which was deposited into the campaign bank account on October 14, 2020, in violation of Government Code Section 84300, subdivision (a).

Count 10: The 2020 Victorville Committee, Gomez, and Robinson failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 through

December 31, 2022 by the January 31, 2023 due date, in violation of Government Code Section 84200.

The Senate Committee, Gomez, and Armstead

- Count 11: The Senate Committee, Gomez, and Armstead failed to timely file a statement of organization with the Secretary of State within 10 days of qualifying as a committee, on or around February 7, 2020, in violation of Government Code Section 84101.
- <u>Count 12</u>: The Senate Committee, Gomez, and Armstead failed to disclose the account number, name, and address of the financial institution in which they had an account, in violation of Government Code Section 84102.
- Count 13: The Senate Committee, Gomez, and Armstead failed to timely file a pre-election campaign statement with SOS for the reporting period of January 1, 2024 through January 20, 2024 by the January 25, 2024 due date, in violation of Government Code Sections 84200.5 and 84215.
- Count 14: The Senate Committee, Gomez, and Armstead failed to timely file a pre-election campaign statement with SOS for the reporting period of January 21, 2024 through February 17, 2024 by the February 22, 2024 due date, in violation of Government Code Sections 84200.5 and 84215.
- Count 15: The Senate Committee, Gomez, and Armstead failed to timely file a 24-hour contribution report for a \$4,300 loan made from Gomez to the Committee on January 27, 2024 by the January 28, 2024 due date, in violation of Government Code Section 84203.
- Count 16: The Senate Committee, Gomez, and Armstead failed to accurately report a loan from Gomez on the pre-election campaign statement ending February 17, 2024, in violation of Government Code Section 84211.
- Count 17: The Senate Committee, Gomez, and Armstead failed to utilize a single designated bank account for contributions and expenditures during the reporting period of January 1, 2020 through January 20, 2024, in violation of Government Code Section 85201.
- Count 18: The Senate Committee, Gomez, and Armstead failed to utilize a single designated bank account for contributions and expenditures during the reporting period of January 21, 2020 through February 17, 2024, in violation of Government Code Section 85201.

Gomez

Count 19: Gomez failed to timely file a Candidate SEI by the November 30, 2023 due date, in violation of Government Code Section 87200.

The Assessor Committee, Gomez, and Robinson

Count 20: The Assessor Committee, Gomez, and Robinson failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2024 through December 31, 2024 by the January 31, 2025 due date, in violation of Government Code Section 84200.

2024 Victorville Committee, Gomez, and Robinson

Count 21: The 2024 Victorville Committee, Gomez, and Robinson failed to timely file a preelection campaign statement with the City of Victorville for the reporting period of September 22, 2024 through October 19, 2024 by the October 24, 2024 due date, in violation of Government Code Section 84200.5.

In the Matter of Valerie Norris, Case No. 2024-00872. On August 18, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

Count 1: Norris failed to timely file an Assuming Office SEI by the May 22, 2020 due date, in violation of Government Code Section 87300.

Count 2: Norris failed to timely file a 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.

Count 3: Norris failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.

Count 4: Norris failed to timely file a 2022 Annual/Leaving Office SEI by the February 27, 2023, due date, in violation of Government Code Section 87300

Count 5: Norris failed to timely file an Assuming Office SEI by the November 22, 2023 due date, in violation of Government Code Section 87300.

<u>Count 6</u>: Norris failed to timely file a Leaving Office SEI by the October 25, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Adam Daniels, Case No. 2024-00796. On August 22, 2025, probable cause was found, on the papers, that Respondent committed the following violations of the Act:

Count 1: Daniels failed to timely file a 2020 Annual SEI by the April 1, 2021, due date, in violation of Government Code Section 87300.

Count 2: Daniels failed to timely file a 2021 Annual SEI by the April 1, 2022, due date, in violation of Government Code Section 87300.

Count 3: Daniels failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.

Count 4: Daniels failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

<u>Count 5</u>: Daniels failed to timely file a Leaving Office SEI by the August 30, 2024 due date, in violation of Government Code Section 87300.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

None.

B. Hiring Process

Legal Division

Attorney Political Reform Consultant

C. Statement of Economic Interest (SEI, Form 700)

April 1 (June 2) Filing Status

As of September 3, 2025, 16,597 2024 annual statements, approximately 98.3% of the total 16,878, had been received and processed. There are still a total of 281 non-filers.

Entity	Total	Filed	Not Filed
Cities A - M	3235	3163	72
Cities N - Z	2445	2383	62
Counties	795	782	13
Groundwater Sustainability Agency (GSA)	1569	1522	47
Keenan	18	18	0
Legislative Staffers	1542	1541	1
Multi-County Agencies	4492	4434	58
State Agencies	2782	2754	28
Total	16,878	16,597	281

	98.3%	1.7%	ì
			i

2025 Year-to-Date E-Filing Summary

As of September 3, 2025, 24,870 annual, assuming office, leaving office, and candidate statements filed using the FPPC's E-filing system.

Entity	Annual	Assuming	Leaving	Candidate	Total
Cities A - M	3,186	670	487	14	4,357
Cities N - Z	2,406	487	369	28	3,290
Constitutional officers	59	10	13	0	82
Counties	790	158	112	4	1,064
Courts	2,297	104	84	0	2,485
Groundwater Sustainability Agency	1,523	175	82	0	1,780
Keenan	18	1	1	0	20
Legislative Staffers	1,541	320	273	0	2,134
Legislature	118	2	11	14	145
Multi-County Agencies	4,456	941	717	0	6,114
State Agencies	2,791	347	260	1	3,399
Total	19,185	3,215	2,409	61	24,870

SEI Unit August 2025 Summary

- Referred 50 cases to the Enforcement
- Issued 49 fine letters
- Issued 127 Non-filer letters and 22 Amendment letters
- Processed 9 Form 462
- Responded 1942 emails from form form form form form and 90 phones calls
- Re-certified 4 existing local e-filing systems and approved 4 new local e-filing systems

D. Collection/Revenue

July 2025 – August 2025 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 6,000	-	-	\$ 6,000
SEI Fine	\$ 600	\$ 7,000	\$ 400	\$ 8,000
PREP	-	\$ 2,800	-	\$ 2,800
Enforcement Collection	\$ 300	-	-	\$ 300
Enforcement Stipulations	\$ 11,532	\$ 9,393	-	\$ 20,925
Reimbursement	\$ 212,245	-	-	\$ 212,245
Total	\$ 230,677	\$ 19,193	\$ 400	\$ 250,270