



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811 • (916) 322-5660

# EXECUTIVE STAFF REPORTS

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*January 15, 2026, Commission Hearing*

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# I. ENFORCEMENT DIVISION

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

## A. Overview

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

	Sworn	Non-Sworn	Anonymous	Referrals
<b>Number Received</b>	70	20	53	228

The number of complaints received by the Enforcement Division in each of November and December decreased, and the number of referrals received by the Enforcement Division in each of November and December increased, compared with the October 2025 report.

For the months of November and December, more time to respond beyond the 14-day statutory period was needed for approximately 33 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 months of November and December, the Enforcement Division opened 149 cases, rejected 135 complaints and referrals, and closed a total of 190 cases including:

- 86 warning letters –advertisement violations (1), lobbying reporting violations (2), statement of economic interests violations (65) and campaign violations (18)
- 69 no action closure letters: PREP completed – advertisement violations (1), statement of economic interests violations (58) and campaign violations (10);
- 16 no action closure letters alleging – behested payment violations (1), conflict of interests violations (1), advertisement violations (2), campaign violations (8), and statement of economic interests violations (4);
- 2 advisory letters;
- 1 approved default from the August Commission Meeting;
- 9 approved stipulations from the November Commission Meeting;
- 5 administrative terminations;
- 2 closed as duplicates.

The Division had a total of 897 cases in various stages of resolution at the time of the November Monthly Report and currently has approximately 856 cases in various stages of resolution, including the 7 streamline, 2 mainline, and 3 pre-notice default cases before the Commission as listed in the January Agenda. Net case closings since the last monthly report totaled 41.

## 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; however, 2025 stands out with an increase in complaints received and a decrease in referrals received compared to other non-election years.

	Year	2021	2022	2023	2024	2025
1	Complaints Received	606	1,379	653	1,456	910
2	Complaints Processed	820	1,050	916	1,334	902
3	Referrals Received	1,751	1,724	1,971	1,393	1,518
4	Referrals Processed	1,539	1,183	1,441	2,171	1,729
5	Total Complaints and Referrals Received	2,357	3,103	2,624	2,849	2,428
6	Cases opened	1,185	990	831	1,403	1,302
7	Cases closed <sup>3</sup>	1,058	1,075	1,295	1,536	1,268
8	Cases with penalties <sup>1</sup>	269	161	98	149	97
	a Streamlines	234	142	79	117	73
	b Mainlines	32	14	17	25	20
	c Defaults	3	5	2	7	3
9	Total fines imposed	\$472,248	\$617,548	\$376,531	\$802,238	\$543,539
10	Warning letters issued	475	681	813	847	741
11	Administrative terminations	59	53	87	80	40
12	Cases closed with violations found <sup>2</sup>	803	895	998	1,076	878
13	Advisory letters issued	16	8	15	12	3
14	No action closure letters	237	217	296	469	383
	a PREP Completed	--	39	86	261	263

<sup>1</sup> Total for lines 8a, 8b, and 8c.

<sup>2</sup> Total for lines 8, 10, and 11.

<sup>3</sup> 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.

### 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.

	December 2024	March 2025	June 2025	September 2025	December 2025	Difference in Existing Caseload Overall
2018	5	3	1	1	1	-4
2019	12	11	8	8	6	-6
2020	40	24	14	11	9	-31
2021	68	54	42	33	30	-38
2022	131	119	104	91	83	-48
2023	194	171	154	148	133	-61
2024	--	318	295	270	251	-67

### D. Presentations

On December 7, 2025, Supervising Special Investigator Lance Hachigian participated in a presentation for the Council on Governmental Ethics Laws (COGEL) entitled “The Sphere of Influence(rs) – Is It that Easy to Follow the Money?” which covered the different types of payments that can influence elected officials.

On December 8, 2025, Supervising Special Investigator Jeffrey Kamigaki presented on a collaborative panel at the 2025 Annual GOGEL Conference, entitled, “Building the Case II: Planning, Drafting, and Executing Your Blueprints for a Successful Case.” The panel covered the step-by-step life cycle of an investigation, including overall strategy, investigative planning, checklist creation, evidence collection, and report writing.

On December 9, 2025, Assistant Enforcement Chief Christopher Burton participated in a presentation for COGEL entitled “Fine Tuning Enforcement: Alternative Sanctions in Ethics Accountability,” which compared the impacts of monetary penalties to alternative enforcement methods in promoting ethical government.

### 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 Vietnamese American Voter Foundation and Huan Nguyen, FPPC No. 20/948.** Staff: Theresa Gilbertson, Attorney Supervisor and Kristin Hamilton, Special Investigator. Huan Nguyen was an unsuccessful candidate for the City of Garden Grove. At the same time, Nguyen was the principal officer and controlled the local general purpose committee, Vietnamese American Voter Foundation. The Committee and Nguyen issued two advertisements that failed to disclose that the Committee was controlled by the candidate, in violation of Government Code Section 84502 and Regulation 18402, subdivision (c)(1) (2 counts). **Total Penalty: \$409 (Tier One).**

## **Campaign Late Filer/Reporter**

**In the Matter of Indio Police Officers Association Political Action Committee, Doug Haynes, and Kathy Weeks; FPPC No. 19/1059.** Staff: Jonathan Rivera, Commission Counsel. Indio Police Officers Association Political Action Committee is a local general purpose committee. Doug Haynes served as the Committee's treasurer from October 1, 2012 through October 17, 2021. Kathy Weeks served as the Committee's treasurer from October 18, 2021 through September 1, 2025. The Committee failed to timely file four semiannual campaign statements, in violation of Government Code Section 84200 (4 counts), two 24-Hour reports, in violation of Government Code Section 84203 (2 counts), and two pre-election campaign statements, in violation of Government Code Sections 84200.5 (2 counts). **Total Penalty: \$816 (Tier One).**

**In the Matter of Citizens For A Better Redding Yes on Measure A, Korey Wells, and Dennis Morgan; FPPC No. 25/1106.** Staff: Jaleena Evans, Commission Counsel. Citizens For A Better Redding, Yes on Measure A is a local primarily formed ballot measure committee. Korey Wells serves as the Committee's treasurer. Dennis Morgan serves as the principal officer. The Committee failed to timely file an amendment to the Statement of Organization to change the Committee's designation and name to reflect that it was primarily formed, in violation of Government Code Section 84103 (1 count), failed to timely file a quarterly campaign statement, in violation of Government Code Section 84202.3 (1 count), failed to timely report expenditures on a semi-annual campaign statement and a pre-election campaign statement, in violation of Government Code Section 84211 (2 counts), and failed to timely report the correct contribution amount received on a 24-Hour Report, in violation of Government Code Section 84203 (1 count). **Total Penalty: \$473 (Tier One).**

**In the Matter of Giovanni Christon-Pope for AV College Board 2022 and Giovanni Christon-Pope; FPPC No. 23/500.** Staff: Chance Felkins, Commission Counsel. Giovanni

Christon-Pope was an unsuccessful candidate for Antelope Valley Community College Board in the November 8, 2022 General Election. Giovanni Christon-Pope for AV College Board 2022 was the candidate's candidate-controlled committee. The Committee failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts), failed to timely file one 24-Hour Report, in violation of Government Code Section 84203 (1 count), and failed timely file one semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). **Total Penalty: \$219 (Tier One).**

#### **Statement of Economic Interests Late Filer/Reporter**

**In the Matter of Iraida Pisano; FPPC No. 25/1242.** Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Iraida Pisano, a Planning Commissioner for the City of San Juan Bautista, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

**In the Matter of Kirk Bronsord; FPPC No. 25/761.** Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Taylor Culberson, Staff Services Analyst. Kirk Bronsord, Director of the Mosquito Fire Protection District, failed to timely file the Assuming Office Statement of Economic Interests in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

**In the Matter of Russel Maben; FPPC No. 25/1147.** Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Russel Maben, an Alternate Member for the Rice Commission, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

## II. AUDITS & ASSISTANCE DIVISION

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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 November 1, 2025, to December 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:

- **Karen Ickes for San Bernardino County Board of Supervisor 2020 (ID# 1420678)**
  - **Finding: Monetary Contributions Received**

A \$125 contribution was received in cash from a contributor and was not itemized on the Form 460 Campaign Disclosure Statements filed. The contribution was included in the total of unitemized contributions of less than \$100.

### C. Public Draw

A public draw was held on December 10, 2025 to select General Purpose Committees. 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

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STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

#### **A. Pending Litigation**

None.

#### **B. Outreach and Training**

##### *Webinars & Workshops*

##### November

- November 6, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants Christian Durham and Kathryn Ito, presented. 141 people attended.
- November 15, the FPPC presented a Candidate/Treasurer webinar requested by the Alameda County Democratic Central Committee. Political Reform Consultants Stephen Hernandez and Kathryn Ito, presented. 60 people attended.
- November 18, the FPPC presented a Statement of Economic Interest Filers webinar. Political Reform Consultants Alexandra Miner and Christian Durham, presented. 98 people attended.
- November 19, the FPPC presented a Campaign Filing Officer – After the Election webinar. Political Reform Consultants Kathryn Ito and Stephen Hernandez, presented. 28 people attended.

##### December

- December 3, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Kathryn Ito and Christian Durham, presented. 31 people attended.
- December 7, Political Reform Education Program and Special Projects Unit Manager, Dominika Wojenska, participated in a panel discussion moderated by Education and External Affairs Unit Manager, Chloe Hackert, at the 2025 annual COGEL conference, examining when advice intersects with enforcement across regulatory agencies.
- December 8, General Counsel Dave Bainbridge participated in a panel discussion moderated by Senior Legislative Counsel Lindsey Nakano at the annual COGEL conference concerning the right to free speech and regulating the use of AI in election campaigns. Former Commissioner Abby Wood also participated in the panel.
- December 9, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultant Kathryn Ito and Telephone Advice & Education Outreach Manager, Vanessa Manriquez, presented. 38 people attended.



- December 11, the FPPC presented a Campaign/Treasurer – After the Election webinar. Political Reform Consultants Alexandra Miner and Stephen Hernandez, presented. 14 people attended.
- December 16, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants Alexandra Miner and Stephen Hernandez, presented. 93 people attended.

#### *Scheduled Webinars*

- January 7, the FPPC is presenting a Statement of Economic Interests Filers webinar.
- January 9, the FPPC is presenting a Campaign/Treasurer – Getting Started webinar.
- January 22, the FPPC is presenting a Statement of Economic Interests Filing Officer webinar.

#### *Video Tutorials:*

**November:** Commission video tutorials were accessed a total of 259 times. Form 700 videos were accessed 147 times, the Candidate/Treasurer video was accessed 84 times, and the filing officer videos were accessed 28 times.

**December:** Commission video tutorials were accessed a total of 251 times. Form 700 videos were accessed 127 times, the Candidate/Treasurer video was accessed 93 times, and the filing officer videos were accessed 31 times.

### **C. New and Updated Educational Resources**

None.

### **D. Political Reform Education Program (PREP):**

#### **November**

<b>Course</b>	<b>Referrals Received</b>	<b>Completions</b>	<b>Failures to Complete</b>	<b>Current Enrollments</b>	<b>Withdrawals</b>
Statement of Economic Interests Course	11	22	5	30	0
Campaign Course for Local Candidates and Candidate-Controlled Committees	1	3	0	6	0
Campaign Course for State Candidates and	0	0	0	0	0

Candidate-Controlled Committees					
Advertisement Course for Candidates and Candidate-Controlled Committees	0	1	0	2	0

## December

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	17	17	2	27	1
Campaign Course for Local Candidates and Candidate-Controlled Committees	2	5	0	3	0
Campaign Course for State Candidates and Candidate-Controlled Committees	1	0	0	1	0
Advertisement Course for Candidates and Candidate-Controlled Committees	0	2	0	0	0

## E. Advice

The [November Advice Letter Report](https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2025-advice-letter-reports.html) is available on the FPPC website at <https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2025-advice-letter-reports.html>.

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

- **Education:** The Education unit responded to 203 requests for technical assistance via telephone.
- **Email Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 232 email requests for advice, 187 of which were responded to within 24 hours, and 217 of which were responded to within 48 hours.

- ***Advice Letters:*** The Legal Division received 8 advice letter requests under the Political Reform Act and completed 6.
- ***Section 1090 Letters:*** The Legal Division received 6 advice letter requests concerning Section 1090 and completed 6.

The [December Advice Letter Report](https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2025-advice-letter-reports.html) is available on the FPPC website at <https://www.fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2025-advice-letter-reports.html>.

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

- ***Education:*** The Education unit responded to 277 requests for technical assistance via telephone.
- ***Email Requests for Advice:*** Political Reform Consultants and Legal Division attorneys collectively responded to 328 email requests for advice, 231 of which were responded to within 24 hours and 266 of which were not responded to within 48 hours.
- ***Advice Letters:*** The Legal Division received 10 advice letter requests under the Political Reform Act and completed 8.
- ***Section 1090 Letters:*** The Legal Division received 4 advice letter requests concerning Section 1090 and completed 8.

## **F. Miscellaneous Decisions**

None.

## **G. Upcoming Regulation Projects**

### February

**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)

## **H. Conflict of Interest Codes**

### **Adoptions and Amendments**

*State Agencies*

- Fiscal Crisis and Management Assistance Team
- Office of the Inspector General, California High-Speed Rail
- Department of Finance

#### *Multi-County Agencies*

- Pajaro Valley Healthcare District Hospital Corporation
- South Bay Regional Public Safety Training Consortium
- California Statewide Automated Welfare System Consortium
- Oakdale Joint Unified School District
- Turlock Unified School District
- Nevada Irrigation District
- Peninsula Clean Energy Authority

#### **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 Margaret Fernandez, Case No. 2024-00354.*** On November 21, 2025, probable cause was found, on the papers, to believe that Respondent committed the following violation of the Act:

#### Count 3: Failure to Timely File a 2024 Annual SEI

Fernandez 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 Susan Feist, Case No. 2024-00935.*** On December 1, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

#### Count 1: Failure to Timely File Assuming Office SEI

Feist failed to timely file an Assuming Office SEI by the January 4, 2023 due date, in violation of Government Code Section 87202.

Count 2: Failure to Timely File a 2023 Annual SEI

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

Count 3: Failure to Timely File a 2024 Annual SEI

Feist 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 Marsha Miller, Case No. 2022-00681.*** On December 10, 2025, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

Count 1: Failure to Timely File Assuming Office SEI

Miller failed to timely file an Assuming Office SEI by July 16, 2021 due date, in violation of Section 87202.

Count 2: Failure to Timely File 2021 Annual SEI

Miller failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87203.

Count 3: Failure to Timely File 2022 Annual SEI

Miller failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87203.

Count 4: Failure to Timely File 2023 Annual SEI

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

***In the Matter of Richard Corvera-Hernandez, Case No. 2024-00589.*** On December 16, probable cause was found, on the papers submitted, to believe that Respondent committed the following violation of the Act:

Count 4: Failure to Timely File a 2024 Annual SEI

Corvera-Hernandez failed to timely file a 2024 Annual SEI by the June 2, 2025 due date, in violation of Government Code Section 87203.

## IV. ADMINISTRATION & TECHNOLOGY DIVISION

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STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

### A. New Employee Report

#### Legal Division

Grant Jordan, Staff Services Analyst

Joanna Gin, Attorney

Andrea Spiller Hernandez, Political Reform Consultant (Promotion)

#### Enforcement Division

Theresa Gilbertson, Attorney Supervisor (Promotion)

### B. Hiring Process

#### Legal Division

Staff Services Analyst

#### Enforcement Division

Attorney

Special Investigator

Staff Services Analyst

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

#### 2025 Year-End E-Filing Summary

In 2025, 26,512 annual, assuming office, leaving office, and candidate statements filed with the Commission through the FPPC's E-filing system, including:

- Annual Statements: 19,286
- Assuming Statements: 4,102
- Leaving Statements: 3,052
- Candidate Statements: 72

Entity	Annual	Assuming	Leaving	Candidate	Total
Cities A - M	3,215	812	609	16	4,652
Cities N - Z	2,434	592	454	33	3,513
Constitutional Officers	59	12	15	0	86
Counties	796	189	141	5	1,131
Courts	2,297	153	114	0	2,564
Groundwater Sustainability Agency	1,525	197	113	0	1,835
Keenan	18	2	2	0	22
Legislative Staffers	1,541	407	358	0	2,306
Legislature	118	3	11	17	149
Multi-County Agencies	4,473	1207	869	0	6,549
State Agencies	2,810	528	366	1	3,705
<b>Total</b>	<b>19,286</b>	<b>4,102</b>	<b>3,052</b>	<b>72</b>	<b>26,512</b>

### 2025 Annual Statement Filing Status

Notifications will begin being sent out during the week of January 5, 2026, reminding FPPC filers that the 2025 Annual Statement of Economic Interests (Form 700) is due by April 1, 2026, for most filers and by March 2, 2026, for elected State Officers, Judges, Court Commissioners, and members of State Boards and Commissions specified in Government Code Section 87200.

### SB 852 Implementation

The recently enacted SB 852 added public officials who manage public investments to the list of individuals for whom the Commission is the filing officer for statements of economic interest. Effective January 1, 2026, those public officials must file their statements of economic interest using the Commission's electronic filing system.

The SEI unit anticipates adding approximately 3,000 SB 852 filers to the system. New filers without existing accounts have begun receiving a welcome email containing login credentials as of January 2, 2026.

## SEI Unit 2025 Year-End Summary

- Referred 413 cases to the Enforcement
- Issued 447 fine letters
- Issued 3690 Non-filer letters and 280 Amendment letters
- Processed 247 Form 462
- Responded 41747 emails from [form700@fppc.ca.gov](mailto:form700@fppc.ca.gov) and 1846 phones calls
- Re-certified 67 existing local e-filing systems

## D. Collection/Revenue

### July 2025 – December 2025 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 22,000	-	-	\$ 22,000
SEI Fine	\$ 3,244	\$ 19,355	\$ 3,514	\$ 26,113
PREP	\$ 50	\$ 8,300	-	\$ 8,350
Enforcement Collection	\$ 700	\$ 1,500	\$ 1,566	\$ 3,766
Enforcement Stipulations	\$ 83,416	\$ 27,053	-	\$ 110,469
Reimbursement	\$ 212,612	-	-	\$ 212,612
Total	<b>\$ 322,022</b>	<b>\$ 56,208</b>	<b>\$ 5,080</b>	<b>\$ 383,310</b>

## E. Information Technology

The FPPC IT unit is continuing work on the website replacement project.