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7
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
9 STATE OF CALIFORNIA
10

11 In the Matter of) FPPC No.: 15/245
12)
13 CORSO FOR COUNCIL 2014,) DEFAULT DECISION AND
TAXPAYERS FOR OCEANSIDE) ORDER
14 NEIGHBORHOODS, and DANA CORSO,)
15 Respondents.) (Government Code Sections 11506
and 11520)

16
17 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
18 submits this Default Decision and Order for consideration by the Fair Political Practices Commission at
19 its next regularly scheduled meeting.

20 Pursuant to the California Administrative Procedure Act,¹ Dana Corso (“Corso”), Corso for
21 Council 2014 (“Corso for Council”), and Taxpayers for Oceanside Neighborhoods (“Taxpayers for
22 Oceanside”) have been served with all of the documents necessary to conduct an administrative hearing
23 regarding the above-captioned matter, including the following:

- 24 1. An Order Finding Probable Cause;
25 2. An Accusation;
26 3. A Notice of Defense (Two Copies per Respondent);
27

28 ¹ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code.

1 4. A Statement to Respondent; and

2 5. Copies of Sections 11506, 11507.5, 11507.6 and 11507.7 of the Government Code.

3 Government Code Section 11506 provides that failure of a respondent to file a Notice of Defense
4 within fifteen days after being served with an Accusation shall constitute a waiver of respondent's right
5 to a hearing on the merits of the Accusation. The Statement to Respondent, served on Corso, Corso for
6 Council, and Taxpayers for Oceanside stated that a Notice of Defense must be filed in order to request a
7 hearing. Corso, Corso for Council, and Taxpayers for Oceanside failed to file a Notice of Defense within
8 fifteen days of being served with an Accusation. Government Code Section 11520 provides that, if the
9 respondent fails to file a Notice of Defense, the Commission may take action, by way of a default, based
10 upon the respondent's express admissions or upon other evidence, and that affidavits may be used as
11 evidence without any notice to the respondent.

12 Corso, Corso for Council, and Taxpayers for Oceanside violated the Political Reform Act as
13 described in Exhibit 1, which is attached hereto and incorporated by reference as though fully set forth
14 herein. Exhibit 1 is a true and accurate summary of the law and evidence in this matter. This Default
15 Decision and Order is submitted to the Commission to obtain a final disposition of this matter.

16
17 Dated: 3 March 20

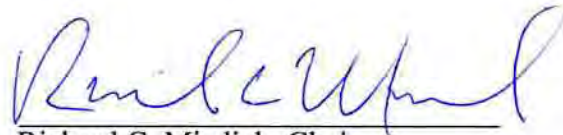
18 
19 _____
20 Galena West, Chief of Enforcement
21 Fair Political Practices Commission
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1 **ORDER**

2 The Commission issues this Default Decision and Order and imposes a total administrative
3 penalty of \$8,500 upon Corso and Corso for Council 2014 and \$7,000 upon Corso and Taxpayers for
4 Oceanside Neighborhoods, payable to the "General Fund of the State of California."

5 IT IS SO ORDERED, effective upon execution below by the Chair of the Fair Political Practices
6 Commission at Sacramento, California.

7
8 Dated: 4/27/2020



Richard C. Miadich, Chair
Fair Political Practices Commission

EXHIBIT 1

INTRODUCTION

Respondent Dana Corso (“Corso”) was an unsuccessful candidate for the Oceanside City Council in 2014. Respondent Corso for Council 2014 (“Corso for Council”) was Corso’s candidate-controlled committee. Respondent Taxpayers for Oceanside Neighborhoods (“Taxpayers for Oceanside”) is a city general purpose committee. Corso served as treasurer of Corso for Council and serves as treasurer of Taxpayers for Oceanside.

The Political Reform Act (“Act”)¹ requires candidate-controlled committees to file campaign statements and reports to disclose their contributions received and expenditures made.

This matter was opened based on an audit of Corso for Council conducted by the California Franchise Tax Board (“FTB”) covering the period of January 1, 2014 – December 31, 2014 and based on complaints alleging Corso for Council and Taxpayers for Oceanside were not in compliance with the filing requirements of the Act.

As a controlled committee, its candidate, and its treasurer, Corso for Council and Corso failed to timely report their activity during the reporting period of July 1, 2014 through September 30, 2014; failed to timely file one pre-election campaign statement for the reporting period of October 1, 2014 through October 18, 2014; failed to timely file one semi-annual campaign statement for the reporting period of October 19, 2014 through December 31, 2014; and failed to timely file three 24-hour contribution reports for contributions received on September 30, 2014; October 1, 2014; and October 31, 2014.

As a controlled committee and its treasurer, Taxpayers for Oceanside and Corso failed to timely file three semi-annual campaign statements for the reporting periods of July 1, 2013 through December 31, 2014; failed to timely amend a statement of organization; and failed to timely file two pre-election campaign statements for the reporting periods of July 1, 2014 through October 18, 2014.

DEFAULT PROCEEDINGS UNDER THE ADMINISTRATIVE PROCEDURE ACT

When the Commission determines that there is probable cause for believing that the Act has been violated, it may hold a hearing to determine if a violation has occurred.² Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure

¹ The Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission (“Commission”) are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

² Section 83116.

Act (the “APA”).³ A hearing to determine whether the Act has been violated is initiated by the filing of an accusation, which shall be a concise written statement of the charges, specifying the statutes and rules which the respondent is alleged to have violated.⁴

Included among the rights afforded a respondent under the APA, is the right to file the Notice of Defense with the Commission within 15 days after service of the accusation, by which the respondent may (1) request a hearing; (2) object to the accusation on the ground it does not state acts or omissions upon which the agency may proceed; (3) object to the form of the accusation on the ground that it is so indefinite or uncertain that the respondent cannot identify the transaction or prepare a defense; (4) admit the accusation in whole or in part; (5) present new matter by way of a defense; or (6) object to the accusation on the ground that, under the circumstances, compliance with a Commission regulation would result in a material violation of another department’s regulation affecting substantive rights.⁵

The APA provides that a respondent’s failure to file a Notice of Defense within 15 days after service of an accusation constitutes a waiver of the respondent’s right to a hearing.⁶ Moreover, when a respondent fails to file a Notice of Defense, the Commission may take action based on the respondent’s express admissions or upon other evidence and affidavits may be used as evidence without any notice to the respondent.⁷

PROCEDURAL REQUIREMENTS AND HISTORY

A. Initiation of the Administrative Action

The service of the probable cause hearing notice, as required by Section 83115.5, upon the person alleged to have violated the Act starts the administrative action.⁸

A finding of probable cause may not be made by the Commission unless the person alleged to have violated the Act is 1) notified of the violation by service of process or registered mail with return receipt requested; 2) provided with a summary of the evidence; and 3) informed of his or her right to be present in person and represented by counsel at any proceeding of the Commission held for the purpose of considering whether probable cause exists for believing the person violated the Act.⁹ Additionally, the required notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office.¹⁰

³ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

⁴ Section 11503.

⁵ Section 11506, subdivision (a)(1)–(6).

⁶ Section 11506, subdivision (c).

⁷ Section 11520, subdivision (a).

⁸ Section 91000.5, subdivision (a).

⁹ Section 83115.5.

¹⁰ Section 83115.5.

No administrative action pursuant to Chapter 3 of the Act alleging a violation of any of the provisions of the Act may be commenced more than five years after the date on which the violation occurred.¹¹

Documents supporting the procedural history are included in the attached Certification of Records (“Certification”) filed herewith at Exhibit 1, A-1 through A-22, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against Corso for Council, Taxpayers for Oceanside, and Corso in this matter by serving them with a Report in Support of a Finding of Probable Cause (the “Report”). (Certification, Exhibit A-1.) Corso for Council, Taxpayers for Oceanside, and Corso were served with the Report by substitute service,¹² on December 11, 2018. (Certification, Exhibit A-2.) The administrative action commenced on December 11, 2018, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on Corso for Council, Taxpayers for Oceanside, and Corso contained a cover letter and a memorandum describing probable cause proceedings, advising that Corso for Council, Taxpayers for Oceanside, and Corso had 21 days in which to request a probable cause conference and/or to file a written response to the Report. (Certification, Exhibit A-3.) Corso for Council, Taxpayers for Oceanside, and Corso did not request a probable cause conference or submit a written response to the Report.

Corso for Council, Taxpayers for Oceanside, and Corso were served with an Amended Report in Support of a Finding of Probable Cause (the “Amended Report”) (Certification, Exhibit A-4) by certified mail, return receipt requested,¹³ on February 28, 2019. (Certification, Exhibit A-5.)

As required by Section 83115.5, the packet served on Corso for Council, Taxpayers for Oceanside, and Corso contained a cover letter and a memorandum describing probable cause proceedings, advising that Corso for Council, Taxpayers for Oceanside, and Corso had 21 days in which to request a probable cause conference and/or to file a written response to the amended Report. (Certification, Exhibit A-6.) Corso for Council, Taxpayers for Oceanside, and Corso did not request a probable cause conference or submit a written response to the amended Report.

B. Ex Parte Request for a Finding of Probable Cause

Because Corso for Council, Taxpayers for Oceanside, and Corso failed to request a probable cause conference or submit a written response to the Report or the Amended Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Finding of

¹¹ Section 91000.5.

¹² Section 83115.5.

¹³ Section 83115.5.

Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on April 10, 2019. (Certification, Exhibit A-7.)

On April 10, 2019, Hearing Officer Jack Woodside, Legal Division, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Corso for Council, Taxpayers for Oceanside, and Corso. (Certification, Exhibit A-8.)

C. The Issuance and Service of the Accusation

Under the Act, if the Hearing Officer makes a finding of probable cause, the Enforcement Division must prepare an accusation pursuant to Section 11503 of the APA, and have it served on the persons who are the subject of the probable cause finding.¹⁴

Section 11503 states:

A hearing to determine whether a right, authority, license, or privilege should be revoked, suspended, limited, or conditioned shall be initiated by filing an accusation or District Statement of Reduction in Force. The accusation or District Statement of Reduction in Force shall be a written statement of charges that shall set forth in ordinary and concise language the acts or omissions with which the respondent is charged, to the end that the respondent will be able to prepare his or her defense. It shall specify the statutes and rules that the respondent is alleged to have violated, but shall not consist merely of charges phrased in the language of those statutes and rules. The accusation or District Statement of Reduction in Force shall be verified unless made by a public officer acting in his or her official capacity or by an employee of the agency before which the proceeding is to be held. The verification may be on information and belief.

Upon the filing of the accusation, the agency must 1) serve a copy thereof on the respondent as provided in Section 11505, subdivision (c); 2) include a post card or other form entitled Notice of Defense that, when signed by or on behalf of the respondent and returned to the agency, will acknowledge service of the accusation and constitute a notice of defense under Section 11506; 3) include (i) a statement that respondent may request a hearing by filing a notice of defense as provided in Section 11506 within 15 days after service upon the respondent of the accusation, and that failure to do so will constitute a waiver of the respondent's right to a hearing, and (ii) copies of Sections 11507.5, 11507.6, and 11507.7.¹⁵ The APA also sets forth the language required in the accompanying statement to the respondent.¹⁶

The Accusation and accompanying information may be sent to the respondent by any means selected by the agency, but no order adversely affecting the rights of the respondent may be made

¹⁴ Regulation 18361.4, subdivision (e).

¹⁵ Section 11505, subdivision (a).

¹⁶ Section 11505, subdivision (b).

by the agency in any case unless the respondent has been served personally or by registered mail as set forth in the APA.¹⁷

On August 16, 2019, the Commission’s Chief of Enforcement, Galena West, issued an Accusation against Corso for Council, Taxpayers for Oceanside, and Corso. (Certification, Exhibit A-9.) In accordance with Section 11505, the Accusation and accompanying information, consisting of a Statement to Respondent, two copies of a Notice of Defense Form for each respondent, copies of Government Code Sections 11506, 11507.5, 11507.6, and 11507.7, were served upon Corso for Council, Taxpayers for Oceanside, and Corso by substitute service on October 1, 2019. The documents were mailed to Corso on October 1, 2019 at the location where they were delivered, making service effective on October 10, 2019.¹⁸ (Certification, Exhibit A-10.)

Along with the Accusation, the Enforcement Division served Corso for Council, Taxpayers for Oceanside, and Corso with a “Statement to Respondent,” which notified them that they could request a hearing on the merits and warned that, unless a Notice of Defense was filed within 15 days of service of the Accusation, they would be deemed to have waived the right to a hearing. (Certification, Exhibit A-11.) Corso for Council, Taxpayers for Oceanside, and Corso did not file a Notice of Defense within the statutory time period, which ended on October 25, 2019.

As a result, on February 5, 2020, the Enforcement Division sent a letter to Corso for Council, Taxpayers for Oceanside, and Corso advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for March 19, 2020. (Certification, Exhibit A-21.) On April 1, 2020, the Enforcement Division sent another letter to Corso for Council, Taxpayers for Oceanside, and Corso advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for April 16, 2020. (Certification, Exhibit A-22.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred in 2014 and 2015. For this reason, all legal references and discussions of law pertain to the Act’s provisions as they existed at that time.

An express purpose of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring all candidates, as well as the committees controlled by them, to disclose all contributions received and expenditures made throughout a campaign.¹⁹ In furtherance of this purpose, the Act requires candidate-controlled committees to file campaign statements at specific times disclosing information regarding contributions received and expenditures made.²⁰

¹⁷ Section 11505, subdivision (c).

¹⁸ Cal. Code Civ. Pro. Section 415.20, subdivision (a).

¹⁹ Section 81002, subdivision (a).

²⁰ Sections 84200 through 84225.

The Act defines a “candidate” as an individual who is listed on the ballot for election to any elective office.²¹ A “controlled committee” is a committee that is controlled directly or indirectly by a candidate or state measure proponent or acts jointly with a candidate, controlled committee, or state measure proponent in connection with the making of expenditures. A candidate or state measure proponent controls a committee if he or she, his or her agent, or any other committee he or she controls has a significant influence on the actions or decisions of the committee.”²² Under the Act, there is not a definition of “significant influence”, but the Commission has advised that a candidate is presumed to exert significant influence “...whenever the candidate is a voting member of a committee’s leadership body...”²³

Every committee must have a treasurer.²⁴ A treasurer is liable, along with the candidate and the committee, for any failure to comply with the Act’s campaign reporting requirements.²⁵

The Act requires the name of a candidate-controlled committee to include the last name of the controlling candidate, the office sought, and the year of the election.²⁶ The Act also requires committees to file an amended statement of organization within ten days to reflect any changes in the information contained in a statement of organization.²⁷

Controlled committees must file semi-annual campaign statements each year no later than July 31 for the reporting period ending on June 30, and no later than January 31 of the following year for the reporting period ending on December 31.²⁸ If the due date falls on a Saturday, Sunday, or official state holiday, “the filing deadline for such a statement or report shall be extended to the next regular business day.”²⁹

In 2014, candidates running for offices being voted upon on the first Tuesday after the first Monday in June or November and their controlled committees were required to file the first pre-election campaign statement no later than October 5 for the period ending September 30, and the second pre-election campaign statement no later than 12 days before the election for the period ending 17 days before the election.³⁰

²¹ Section 82007.

²² Section 82016, subdivision (a).

²³ *Ferguson* Advice Letter, No. A-86-044. FPPC advice letters are issued pursuant to Government Code Section 83114, subdivision (b), and California Code of Regulations, Title 2, Section 18329. They offer guidance to the public, and under certain circumstances, the requestor may use the advice as a defense in an enforcement proceeding. Although the ultimate resolution of legal issues regarding statutory interpretation lies with the courts, the advice of the FPPC as an agency empowered by the Legislature to interpret and enforce the Political Reform Act is entitled to weight (Section 83114).

²⁴ Section 84100.

²⁵ Sections 83116.5 and 91006.

²⁶ Former Regulation 18402, subdivision (c)(1) and (2).

²⁷ Section 84103.

²⁸ Section 84200, subdivision (a)

²⁹ Regulation 18116, subdivision (a).

³⁰ Former Section 84200.5, subdivision (b) and Section 84200.7, subdivision (b)(1) and (2).

The Act requires each campaign statement to contain information pertaining to the total amount of contributions received during the applicable period, the total amount of expenditures made during the applicable period, and the name, street address, occupation, and employer of any contributor that has made contributions totaling more than \$100 in the applicable period.³¹

Under the Act in 2014, a late contribution was defined as “a contribution, including a loan, that totals in the aggregate one thousand dollars (\$1,000) or more and is made to or received by a candidate, a controlled committee, or a committee formed or existing primarily to support or oppose a candidate or measure within 90 days before the date of the election...”³² A candidate or committee that makes or receives a late monetary contribution is required to report it within 24-hours of making or receiving a late contribution.³³ Additionally, a candidate or committee that receives a late in-kind contribution shall report that activity within 48 hours of receiving a late in-kind contribution.³⁴

Candidates for city office and their controlled committees must file campaign statements with the clerk of the city.³⁵

SUMMARY OF THE EVIDENCE

Corso for Council qualified as a recipient committee on or around August 17, 2014. (Certification, Exhibits A-12 and A-14.) Corso for Council reported receiving contributions totaling approximately \$26,388 and making expenditures totaling approximately \$25,194.

Corso was an unsuccessful candidate for the Oceanside City Council in the November 4, 2014 General Election. At the time of running for city council, Corso was also serving as the treasurer of Taxpayers for Oceanside, which is a role she began on or around January 1, 2013. (Certification, Exhibit A-13.)

Corso for Council

Corso for Council and Corso failed to timely report contributions received on a pre-election campaign statement for the reporting period of July 1, 2014 through September 30, 2014 filed on October 6, 2014. (Certification, Exhibit A-14 and A-19.) Specifically, Corso for Council and Corso failed to timely report a \$200 monetary contribution received from Corso and \$1,000 in-kind contribution received from Oceanside Associates (Certification, Exhibit A-19.). The pre-election campaign statement was amended on July 15, 2015. (Certification, Exhibit A-15.) Corso included the in-kind contribution on the amended campaign statement; however, she reported the office space as valued at \$1,000 for 2 1/2 months instead of \$1,000 for the reporting period.

³¹ Section 84211, subdivisions (a), (b), and (f).

³² Former Section 82036, subdivision (a).

³³ Section 84203, subdivision (a) and (b).

³⁴ Section 84203.3, subdivision (b).

³⁵ Section 84215, subdivisions (d) and (f).

Corso for Council and Corso failed to timely file a pre-election campaign statement for the reporting period of October 1, 2014 through October 18, 2014 (Certification, Exhibit A-16) and a semi-annual campaign statement for the reporting period of October 19, 2014 through December 31, 2014 (Certification, Exhibit A-17 and A-19), as shown in the following chart:

Statement	Reporting Period	Due Date	Date Filed	Aggravating Factors
Pre-Election	October 1, 2014 – October 18, 2014	October 23, 2014	October 27, 2014	Corso for Council used an incorrect reporting period of October 1, 2014 – October 22, 2014. A \$581 in-kind contribution from Oceanside Associates was not reported on the pre-election statement. Instead, it was reported on an amendment to the semi-annual statement ending December 31, 2014 as a lump sum. ³⁶ (Certification, Exhibit A-19 and A-20.)
Semi-Annual	October 19, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Corso for Council used an incorrect reporting period of October 23, 2014 – December 31, 2014. Corso for Council over-reported the loans she made to the campaign by \$2,010. FTB determined Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no transactions that matched Corso’s reported amount. (Certification, Exhibit A-19.) A \$919 in-kind contribution from Oceanside Associates was not reported. (Certification, Exhibit A-19.)

Corso for Council and Corso failed to timely file three 24-hour contribution reports, as shown in the following chart (Certification, Exhibit A-14, A-16, A-19 and A-20.):

³⁶ The in-kind contribution totals the amount incurred during the period. For example, the total for the month was \$1,000, but amount incurred during the period was \$581.

Date Received	Contributor	Amount	Date Filed
September 30, 2014	Oceanside Associates	\$1,000 in-kind contribution for office space (Certification, Exhibit A-15 and A-19)	Not filed
October 1, 2014	Bernard Blom	\$1,000 in total monetary contributions (Certification, Exhibits A-14, A-16, A-19)	Not filed
October 31, 2014	Oceanside Associates	\$1,000 in-kind contribution for office space (Certification, Exhibit A-19.)	Not filed

Taxpayers for Oceanside

Taxpayers for Oceanside and Corso failed to timely file the following campaign statements. (Certification, Exhibit A-18.)

Statement	Reporting Period	Due Date	Date Filed	Activity ³⁷
Semi-Annual	July 1, 2013 – December 31, 2013	January 31, 2014	March 27, 2014	Contributions: \$321 Expenditures: \$541
Semi-Annual	January 1, 2014 – June 30, 2014	July 31, 2014	October 27, 2014	Contributions: \$491 Expenditures: \$467
Semi-Annual	July 1, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Contributions: \$1,176 Expenditures: \$760

In an interview with Program Specialist Bob Perna of the Commission, Corso testified that she has served as treasurer and president of Taxpayers for Oceanside since January of 2013 and is a voting member of the five-person board. (Certification, Exhibits A-12 and A-19.) A candidate controls a committee if he or she has a significant influence on the actions or decisions of the committee. The Commission has advised that a candidate is presumed to exert significant influence “...whenever the candidate is a voting member of a committee’s leadership body...”³⁸ Based on the Act’s definition of a controlled committee, Corso’s ability to exert significance influence over the decisions of Taxpayers for Oceanside means that she controlled Taxpayers for Oceanside.

As a result of Corso simultaneously running for city council and controlling Taxpayers for Oceanside, Taxpayers for Oceanside and Corso were required to change the committee’s name on the statement of organization to include the controlling candidate’s last name, the office being sought, and the year of the election. Taxpayers for Oceanside and Corso were required to amend the statement of organization within 10 days of Corso for Council qualifying as a recipient

³⁷ Amounts are based on filed campaign statements.

³⁸ *Ferguson Advice Letter*, No. A-86-044.

committee. Taxpayers for Oceanside and Corso failed to timely amend the statement of organization. (Certification, Exhibit A-19.)

Taxpayers for Oceanside and Corso were also required to file pre-election campaign statements before the November 4, 2014 General Election because the committee was controlled by Corso. Taxpayers for Oceanside and Corso failed to timely file pre-election campaign statements for the reporting periods of July 1, 2014 through September 30, 2014 and October 1, 2014 through October 18, 2014. (Certification, Exhibit A-19.)

Summary of Contacts

Overall, the Respondents were contacted at least sixteen times regarding their duties to file campaign statements, as follows:

- February 6, 2015: letter from the City Clerk
- April 16, 2015: letter and email from the Enforcement Division
- May 20, 2015: email from the Enforcement Division
- May 21, 2015: email from the Enforcement Division
- June 17, 2015: email from the Enforcement Division
- June 24, 2015: email from the Enforcement Division
- July 15, 2015: email from the Enforcement Division
- July 11, 2017: phone call from the Enforcement Division
- April 23, 2018: email from the Enforcement Division
- October 3, 2018: voicemail from the Enforcement Division
- December 11, 2018: Report in Support of a Finding of Probable Cause sub-served on Corso for Council, Taxpayers for Oceanside, and Corso
- February 28, 2019: Amended Report in Support of a Finding of Probable Cause served on Corso for Council, Taxpayers for Oceanside, and Corso
- April 10, 2019: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served mailed to Corso for Council, Taxpayers for Oceanside, and Corso
- October 10, 2019: Accusation served upon Corso for Council, Taxpayers for Oceanside, and Corso
- February 5, 2020: letter from the Enforcement Division.

VIOLATIONS

Corso for Council, Taxpayers for Oceanside, and Corso committed twelve violations of the Act, as follows:

Violations: Corso for Council and Corso

COUNT 1

Failure to Timely Report Contributions

Corso for Council and Corso had a duty to timely report a \$200 monetary contribution from Corso and a \$1,000 in-kind contribution from Oceanside Associates on a pre-election campaign statement for the reporting period of July 1, 2014 through September 30, 2014, due on October 6, 2014. By failing to report the \$200 contribution from Corso and the \$1,000 contribution from Oceanside Associates by October 6, 2014, Corso for Council and Corso violated Government Code Section 84211, subdivisions (a), (c), and (f).

COUNT 2

Failure to Timely File a Pre-Election Campaign Statement

Corso for Council and Corso had a duty to timely file a pre-election campaign statement for the reporting period of October 1, 2014 through October 18, 2014, due on October 23, 2014. By failing to timely file this statement, Corso for Council and Corso violated Government Code Sections 84200.5, subdivision (b) and 84200.7, subdivision (b).

COUNT 3

Failure to Timely File a Semi-Annual Campaign Statement

Corso for Council and Corso had a duty to timely file a semi-annual campaign statement for the reporting period of October 19, 2014 through December 31, 2014, due on February 2, 2015. By failing to timely file this statement, Corso for Council and Corso violated Government Code Section 84200.

COUNT 4

Failure to Timely File a 24-Hour Contribution Report

Corso for Council and Corso had a duty to timely file a 24-hour contribution report after receiving a \$1,000 in-kind contribution in the form of office space from Oceanside Associates on September 30, 2014. By failing to timely file this report, Corso for Council and Corso violated Government Code Sections 84203 and 84203.3, subdivision (b).

COUNT 5

Failure to Timely File a 24-Hour Contribution Report

Corso for Council and Corso had a duty to timely file a 24-hour contribution report after receiving contributions from Bernard Blom that aggregated to \$1,000 on October 1, 2014. By failing to timely file this report, Corso for Council and Corso violated Government Code Section 84203

COUNT 6

Failure to Timely File a 24-Hour Contribution Report

Corso for Council and Corso had a duty to timely file a 24-hour contribution report after receiving a \$1,000 in-kind contribution in the form of office space from Oceanside Associates on October 31, 2014. By failing to timely file this report, Corso for Council and Corso violated Government Code Sections 84203 and 84203.3, subdivision (b).

Violations: Taxpayers for Oceanside and Corso

COUNT 7

Failure to Timely File a Semi-Annual Campaign Statement

Taxpayers for Oceanside and Corso had a duty to timely file a semi-annual campaign statement for the reporting period of July 1, 2013 through December 31, 2013, due on January 31, 2014. By failing to timely file this statement, Taxpayers for Oceanside and Corso violated Government Code Section 84200.

COUNT 8

Failure to Timely File a Semi-Annual Campaign Statement

Taxpayers for Oceanside and Corso had a duty to timely file a semi-annual campaign statement for the reporting period of January 1, 2014 through June 30, 2014, due on July 31, 2014. By failing to timely file this statement, Taxpayers for Oceanside and Corso violated Government Code Section 84200.

COUNT 9

Failure to Timely File a Semi-Annual Campaign Statement

Taxpayers for Oceanside and Corso had a duty to timely file a semi-annual campaign statement for the reporting period of July 1, 2014 through December 31, 2014, due on February 2,

2015. By failing to timely file this statement, Taxpayers for Oceanside and Corso violated Government Code Section 84200.

COUNT 10

Failure to Timely File an Amended Statement of Organization

Taxpayers for Oceanside and Corso had a duty to amend its statement of organization on or around August 17, 2014 to include Corso's last name in the name of the committee, the office being sought, and the year of the election. By failing to timely amend this statement, Taxpayers for Oceanside and Corso violated Government Code Section 84103 and Regulation 18402, subdivisions (c)(1) and (2).

COUNT 11

Failure to Timely File a Pre-Election Campaign Statement

Taxpayers for Oceanside and Corso had a duty to timely file a pre-election campaign statement for the reporting period of July 1, 2014 through September 30, 2014, due on October 6, 2014. By failing to timely file this statement, Taxpayers for Oceanside and Corso violated Government Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

COUNT 12

Failure to Timely File a Pre-Election Campaign Statement

Taxpayers for Oceanside and Corso had a duty to timely file a pre-election campaign statement for the reporting period of October 1, 2014 through October 18, 2014, due on October 23, 2014. By failing to timely file this statement, Taxpayers for Oceanside and Corso violated Government Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

CONCLUSION

This matter consists of twelve counts of violating the Act, which carry a maximum total administrative penalty of \$60,000.³⁹

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division considers the facts and circumstances of the violation in the context of the following factors set forth in Regulation 18361.5 subdivision (d)(1) through (6): (1) The seriousness of the violation; (2) The presence or absence of any intention to conceal, deceive or mislead; (3) Whether

³⁹ Section 83116, subdivision (c).

the violation was deliberate, negligent or inadvertent; (4) Whether the violator demonstrated good faith by consulting the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b); (5) Whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and (6) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.

Regarding the violations by Corso for Council and Corso, Corso for Council and Corso's failure to timely report pre-election campaign activity was a serious violation of the Act because it denied voters timely disclosure. Corso for Council's and Corso's failure to file appears to have been negligent rather than intentional. Corso for Council and Corso timely filed 24-hour contribution reports for three other contributions received before the 2014 election and totaling \$8,000; therefore, Corso was aware of the obligation to file 24-hour contribution reports. Corso for Council's and Corso's failure to report and file was a part of a consistent pattern throughout the course of 2014. Corso for Council and Corso filed the outstanding campaign statements after the required due dates but did not file the outstanding 24-hour contribution reports.

Regarding the violations by Taxpayers for Oceanside and Corso, the failure to timely file three semi-annual campaign statements denied the public the opportunity to learn about Taxpayers for Oceanside's campaign activity. However, the failure to timely file the semi-annual campaign statements appeared to be negligent and a part of a consistent pattern of failing to timely file.

Taxpayers for Oceanside's and Corso's failure to disclose that she Corso was controlling Taxpayers for Oceanside on the 410 statement of organization and the failure to timely file pre-election campaign statements because it prevented the public from knowing the she Corso was controlling two committees during the election. But it appears that it was the result of negligence rather than intentional conduct. Because Corso controlled Taxpayers for Oceanside, all of the contributions and expenditures should have been processed through a single campaign bank account for Corso for Council; however, this violation was not charged due to the low amount that was reportedly received and spent.

Corso was an unsuccessful candidate for the Oceanside City Council in 2014 and 2018. Previously, Corso was an unsuccessful candidate for the Oceanside City Council in 2012, so she knew or should have known of her obligations to file campaign statements.

The Enforcement Division also takes into consideration previous cases that were approved by the Commission in determining penalties. In this matter, the following cases were used as guidelines:

Count 1

- *In the Matter of Violeta Alvarez, Re-Elect Violeta Alvarez for Bell City Council 2015, and Mario Estrada*, FPPC No. 15/150. (The Commission approved a default decision on October 18, 2018.) The Respondents, among other violations, failed to timely report all

contributions and expenditures on campaign statements for the reporting periods of January 1, 2014 through December 31, 2015. The Commission imposed a penalty of \$3,000 for this violation. However, Alvarez failed to disclose any campaign activity before the relevant election, and the reporting violations could not be remedied with amendments since no records were maintained. Corso provided some disclosure before the election and amended the campaign statement in question after the election.

- A penalty of \$1,500 is recommended because Corso reported the majority of her activity prior to the election.

Counts 2 and 11-12

- *In the Matter of Eric Payne and Eric Payne for SCCCD 2016 Trustee Area 2*, FPPC No. 16/19917. (The Commission approved a default decision on June 13, 2019.) The Respondents, among other violations, failed to timely file two pre-election campaign statements. The Commission imposed a penalty of \$3,000 per count. Corso for Council and Corso failed to timely file one-prelection campaign statement; however, the statement was filed before the relevant election. Taxpayers for Oceanside and Corso did not file the required pre-election campaign statements.
 - A penalty of \$2,000 is recommended for Count 2 because the pre-election statement was filed prior to the election.
 - A penalty of \$3,000 per Count is recommended for Counts 11 and 12 because the pre-election statements for Taxpayers were never filed.

Counts 3 and 7-9

- *In the Matter of Re-Elect Terry Cox for Central Unified School District Trustee Area 6, 2016, Terry Cox, and Julie Lim*, FPPC No. 17/382. (The Commission approved a default decision on June 13, 2019.) The Respondents failed to timely file three semi-annual campaign statements. The Commission imposed a penalty of \$3,000 per count. However, Cox was a successful candidate and was holding office when the violations occurred, and Corso lost the election.
 - A penalty of \$2,000 is recommended for Counts 2, 7, and 9 because Corso was unsuccessful, and the amount of the activity reported on her campaign statements was low.

Counts 4-6

- *In the Matter of Angel Santiago, Friends of Angel Santiago for Inland Empire Utilities Agency Director Division 4, and Valerie Santiago*, FPPC No. 13/547. (The Commission approved a default decision on December 17, 2015.) The respondents, among other

violations, failed to timely file four 24-hour contribution reports for contributions in the amount of \$1,500; \$5,000; \$1,000; and \$3,000. The Commission imposed a penalty of \$4,000 per count. Santiago was a successful candidate and failed to provide any disclosure before the election. Corso was not successful and filed pre-election campaign statements before the relevant election but failed to disclose the late contributions in question.

- A penalty of \$3,000 per count is recommended for Counts 4-6 because the contributions were not reported prior to the election.

Count 10

- *In the Matter of Eric Payne and Eric Payne for SCCCD 2016 Trustee Area 2*, FPPC No. 16/19917. (The Commission approved a default decision on June 13, 2019.) The Respondents, among other violations, failed to timely amend a statement of organization. The Commission imposed a penalty of \$2,000 per count.

- A penalty of \$2,000 is recommended for Count 10.

PROPOSED PENALTY

After considering the factors of Regulation 18361.5 and the penalties imposed in prior cases, the following penalties are proposed:

Counts	Violations: Corso for Council and Corso	Proposed Penalty per Count
1	Failure to Timely Report Contributions	\$1,500
2	Failure to Timely File a Pre-Election Campaign Statement	\$2,000
3	Failure to Timely File a Semi-Annual Campaign Statement	\$2,000
4-6	Failure to Timely File a 24-Hour Contribution Report	\$3,000
	Total:	\$8,500

Counts	Violations: Taxpayers for Oceanside and Corso	Proposed Penalty per Count
7-9	Failure to Timely File a Semi-Annual Campaign Statement	\$2,000
10	Failure to Timely File an Amended Statement of Organization	\$2,000
11-12	Failure to Timely File a Pre-Election Campaign Statement	\$3,000
	Total:	\$7,000



**DECLARATION OF CUSTODIAN OF RECORDS
CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
Enforcement Division**

CERTIFICATION OF RECORDS

The undersigned declares and certifies as follows:

1. I am employed as an Associate Governmental Program Analyst by the California Fair Political Practices Commission (Commission). My business address is: California Fair Political Practices Commission, 1102 Q St, Ste 3000, Sacramento, CA 95811.
2. I am a duly authorized custodian of the records maintained by the Commission in the Enforcement Division. As such, I am authorized to certify copies of those records as being true and correct copies of the original business records which are in the custody of the Commission.
3. I have reviewed documents maintained in *FPPC Case No. 15/245; Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso*, and have caused copies to be made of documents contained therein. I certify that the copies attached hereto are true and correct copies of the documents prepared in the normal course of business and which are contained in files maintained by the Commission. The attached documents are as follows:

- EXHIBIT A-1: Report in Support of a Finding of Probable Cause, dated September 4, 2018
- EXHIBIT A-2: Proofs of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated April 10, 2019 and November 30, 2018
- EXHIBIT A-3: Cover letter to the Respondents regarding the Report in Support of a Finding of Probable Cause, dated September 4, 2018, memorandum describing Probable Cause Proceedings, and applicable statutes and regulations
- EXHIBIT A-4: Amended Report in Support of a Finding of Probable Cause, dated February 26, 2019
- EXHIBIT A-5: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated February 26, 2019, and a certified mail receipt

- EXHIBIT A-6: Cover letter to the Respondents regarding the Report in Support of a Finding of Probable Cause, dated February 26, 2019, memorandum describing Probable Cause Proceedings, and applicable statutes and regulations
- EXHIBIT A-7: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated April 10, 2019
- EXHIBIT A-8: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated April 10, 2019
- EXHIBIT A-9: Accusation, dated August 16, 2019
- EXHIBIT A-10: Affidavit of Process Server for Accusation and accompanying documents, dated October 16, 2019
- EXHIBIT A-11: Statement to Respondents, Notices of Defense, applicable statutes, and Proof of Service for Accusation and accompanying documents, dated August 16, 2019
- EXHIBIT A-12: Initial statement of organization filed by Corso for Council 2014 on July 28, 2014
- EXHIBIT A-13: Amended statement of organization filed by Taxpayers for Oceanside Neighborhoods on March 18, 2013
- EXHIBIT A-14: Pre-election campaign statement for the reporting period of July 1, 2014 through September 30, 2014 filed by Corso for Council 2014 on October 6, 2014
- EXHIBIT A-15: Amended campaign statement for the reporting period of July 1, 2014 through September 30, 2014 filed by Corso for Council 2014 on July 15, 2015
- EXHIBIT A-16: Campaign statement for the reporting period of October 1, 2014 through October 22, 2014 filed by Corso for Council 2014 on October 27, 2014
- EXHIBIT A-17: Semi-annual campaign statement for the reporting period of October 23, 2014 through December 31, 2014 filed by Corso for Council 2014 on May 11, 2015
- EXHIBIT A-18: Semi-annual campaign statements for the reporting periods of July 1, 2013 through December 31, 2014 filed by Taxpayers for Oceanside Neighborhoods on March 27, 2014; October 27, 2014; and May 11, 2015
- EXHIBIT A-19: Declaration of Bob Perna in Support of Default Decision and Order, dated March 4, 2020
- EXHIBIT A-20: Amended campaign statement for the reporting period of October 23, 2014 through December 31, 2014 filed by Corso for Council 2014 on July 15, 2015

EXHIBIT A-21: Notice of Default Decision and Order, dated February 5, 2020

EXHIBIT A-22: Notice of Intent to Enter Default Decision and Order, dated April 1, 2020

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on April 1, 2020, at Sacramento, California.



Domihika Wojenska
Associate Governmental Program Analyst
Enforcement Division
Fair Political Practices Commission

Exhibit A-1

1 GALENA WEST
Chief of Enforcement
2 MICHAEL W. HAMILTON
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 322-5772
5 Email: mhamilton@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission

8
9 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
10 **STATE OF CALIFORNIA**

11 In the Matter of

) FPPC No. 15/245

12)
13)
14) CORSO FOR CITY COUNCIL 2014,
TAXPAYERS FOR OCEANSIDE
NEIGHBORHOODS, AND DANA
15 CORSO,

) **REPORT IN SUPPORT OF A FINDING OF
PROBABLE CAUSE**

) Conference Date: TBA

) Conference Time: TBA

) Conference Location: Commission Offices
1102 Q Street, Suite 3000
Sacramento, CA 95811

16 Respondents.
17)
18)
19)

20 **INTRODUCTION**

21 Respondent Dana Corso ("Corso") was an unsuccessful candidate for the Oceanside City Council
22 in 2014. Respondent Corso for Council 2014 ("Corso for Council") is Corso's controlled committee.
23 Respondent Taxpayers for Oceanside Neighborhoods ("Taxpayers for Oceanside") is a city general
24 purpose committee. Corso serves as treasurer of both Corso for Council and Taxpayers for Oceanside.
25
26
27

1 The Political Reform Act (the "Act")¹ requires committees and candidates to do the following: timely file
2 semi-annual campaign statements by July 31 and January 31 of each year, timely file prelection
3 statements, timely report the receipt of contributions on all campaign statements, and it requires 24-hour
4 reports to be filed within 24-hours of receiving or making a late contribution in the 90 days leading up to
5 an election. Furthermore, the Act prohibits a candidate from making expenditures out of any bank account
6 other than the one designed for campaign activity on their statement of organization.

7 Corso for Council and Corso violated the Act by failing to timely report the receipt of
8 contributions, failing to timely file a prelection statement, failing to timely file a semi-annual statement,
9 and by failing to timely file 24-hour reports.

10 Taxpayers for Oceanside and Corso violated the Act by failing to timely file four semi-annual
11 campaign statements, failing to timely file an amendment to its statement of organization, and failing to
12 timely file two prelection campaign statements.

13 **SUMMARY OF THE LAW**

14 All legal references and discussions of law pertain to the Act's provisions as they existed at the
15 time of the violations.

16 Jurisdiction

17 The Fair Political Practices Commission (the "Commission") has administrative jurisdiction to
18 enforce the provisions of the Act.²

19 Probable Cause Proceedings

20 Prior to the Enforcement Division commencing an administrative action, the General Counsel of
21 the Commission or her designee (the "hearing officer"), must make a finding that there is probable cause
22 to believe the respondent has violated the Act.³ After a finding of probable cause, the Commission may
23

24
25 ¹ The Political Reform Act is contained in Government 81000 through 91014. The regulations of the Fair Political
Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

26 ² Section § 83116.

27 ³ Section 83115.5, and Reg. 18361 and 18361.4.

1 hold a noticed hearing in accordance with the Administrative Procedure Act⁴ to determine whether
2 violations occurred, and levy an administrative penalty of up to \$5,000 for each violation.⁵

3 Standard for Finding Probable Cause

4 To make a finding of probable cause, the hearing officer must be presented with sufficient
5 evidence to lead a person of ordinary caution and prudence to believe, or entertain a strong suspicion,
6 that a respondent committed or caused a violation.⁶

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

8 When enacting the Political Reform Act, the people of the state of California found and declared
9 that previous laws regulating political practices suffered from inadequate enforcement by state and local
10 authorities.⁷ To that end, the Act must be liberally construed to achieve its purposes.⁸

11 Controlled Committee

12 Under the Act, a controlled committee is defined as a "...committee that is controlled directly or
13 indirectly by a candidate or state measure proponent or that has acted jointly with a candidate, controlled
14 committee, or state measure proponent in connection with the making of expenditures. A candidate or
15 state measure proponent controls a committee if he or she, his or her agent, or any other committee he or
16 she controls has a significant influence on the actions or decisions of the committee."⁹ Under the Act,
17 there is not a definition of "significant influence", but the Commission has advised that a candidate is
18 presumed to exert significant influence "...whenever the candidate is a voting member of a committee's
19 leadership body..."¹⁰

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21 _____
22 ⁴ Section 11500, et seq.

23 ⁵ Section 83116, and Reg. 18361.4, subdivision. (e).

24 ⁶ Reg. 18361.4, subdivision, (e).

25 ⁷ Section 81001, subdivision (h).

26 ⁸ Section 81003.

27 ⁹ Section 82016, subdivision (a).

28 ¹⁰ *Ferguson Advice Letter*, No. A-86-044. FPPC advice letters are issued pursuant to Government Code section 83114, subdivision (b), and California Code of Regulations, title 2, section 18329. They offer guidance to the public, and under certain circumstances, the requestor may use the advice as a defense in an enforcement proceeding. Although the ultimate resolution of legal issues regarding statutory interpretation lies with the courts, the advice of the FPPC as an agency empowered by the Legislature to interpret and enforce the Political Reform Act is entitled to weight.

1 Semi-Annual Campaign Statements

2 The Act requires candidates and committees to file semi-annual statements each year "...no later
3 than July 31 for the period ending June 30, and no later than January 31, for the period ending December
4 31..."¹¹ However, if the due date falls on a Saturday, Sunday, or official state holiday, "the filing deadline
5 for such a statement or report shall be extended to the next regular business day."¹²

6 Preelection Campaign Statement

7 The Act states that "All candidates appearing on the ballot to be voted on at the next election, their
8 controlled committees, and committees primarily formed to support or oppose an elected officer,
9 candidate, or measure appearing on the ballot to be voted on at the next election shall file the applicable
10 preelection statements."¹³ A candidate and their controlled committee are required to file a preelection
11 statement on October 5 for the period ending September 30 and for the period ending 17 days before an
12 election the statement shall be filed no later than 12 days before the election.¹⁴

13 Contents of a Campaign Statement

14 The Act requires each campaign statement to contain information pertaining to the total amount of
15 contributions received during the applicable period, the total amount of expenditures made during the
16 applicable period, and the name, street address, occupation, and employer of any contributor that has made
17 contributions totaling more than \$100 in the applicable period.¹⁵

18 Statement of Organization Amendments

19 The Act requires committees to file an amendment statement of organization within ten days to
20 reflect any changes.¹⁶

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22 ///

23 ¹¹ Section 84200, subdivision (a).

24 ¹² Regulation 18116, subdivision (a).

25 ¹³ Section 84200.5, subdivision (b)

26 ¹⁴ Section 84200.7, subdivision (b)(1) and (2).

27 ¹⁵ Section 84211, subdivisions (a), (b), and (f).

28 ¹⁶ Section 84103.

1 Naming a Controlled Committee

2 The Act requires the name of a candidate controlled committee to include the last name of the
3 controlling candidate, the office sought, and the year of the election.¹⁷

4 24-Hour Reports

5 Under the Act, a late contribution is defined as “A contribution, including a loan, that totals in the
6 aggregate one thousand dollars (\$1,000) or more and is made to or received by a candidate, a controlled
7 committee, or a committee formed or existing primarily to support or oppose a candidate or measure
8 within 90 days before the date of the election...”¹⁸ A candidate or committee that receives or makes a late
9 monetary contribution is required to report within 24-hours the receipt or making of a late contribution.¹⁹
10 Additionally, a candidate or committee that makes or receives a late in-kind contribution shall report that
11 activity within 48 hours of making or receiving a late in-kind contribution.²⁰

12 Candidate and Treasurer Liability

13 Under the Act, it is the duty of the candidate and treasurer of a controlled committee to ensure that
14 the committee complies with all the requirements of the Act concerning the receipt, expenditure, and
15 reporting of funds.²¹ The candidate may be held jointly and severally liable, along with the committee, for
16 violations committed by the committee.²²

17 Liability for Violations

18 Under the Act, “Any person who violates any provision of this title, who purposely or negligently
19 causes any other person to violate any provision of this title, or who aids and abets any other person in the
20 violation of this title shall be liable... This section shall only apply to persons who have filing or reporting
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22

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24 ¹⁷ Regulation 18402, subdivision (c)(1) and (2).

¹⁸ Section 82036, subdivision (a).

¹⁹ Section 84203, subdivision (a) and (b).

²⁰ Section 84203.3, subdivision (b).

²¹ Sections 81004, 84100 84213, and Regulation 18427.

²² Sections 83116.5 and 91006.

1 obligations under this title, or who are compensated for services involving the planning, organizing, or
2 directing any activity regulated or required by this title...²³

3 SUMMARY OF THE EVIDENCE

4 On November 4, 2014, Corso was an unsuccessful candidate in the County of San Diego's
5 General Election for Oceanside City Council. Corso for Council qualified as a committee on or around
6 August 17, 2014. Corso for Council received approximately \$26,388 in contributions and made
7 approximately \$25,194 in expenditures. At the time Corso was running for city council, Corso was also
8 serving as the treasurer of Taxpayers for Oceanside, which is a role she began on or around March 18,
9 2013. This matter was opened based on an audit of Corso for Council conducted by the California
10 Franchise Tax Board ("FTB") covering the period of January 1, 2014 – December 31, 2014 and based on
11 several complaints alleging Corso for Council and Taxpayers for Oceanside were not in compliance with
12 the filing requirements of the Act.

13 The FTB found and the Enforcement Division confirmed that Corso for Council violated the Act
14 by failing to timely report contributions, failing to timely file 24-hour reports, and accepting cash
15 contributions. Furthermore, the Enforcement Division determined that Corso was controlling Taxpayers
16 for Oceanside at the same time she was running for Oceanside City Council. Taxpayers for Oceanside
17 violated the Act by failing to timely file four semi-annual campaign statements, failing to timely file an
18 amended statement of organization to change the name of the committee, and failing to timely file two
19 preelection campaign statements

20 Corso for City Council Reporting and Filing

21 During Corso's 2014 campaign for Oceanside City Council, Corso for Council committed the
22 following reporting and filing violations:

23 ///

24 ///

25 ///

26 ²³ Section 83116.5.

Failure to Timely Report

Statement	Reporting Period	Monetary contributions	In-Kind contributions	Due Date	Date of Filing	Date of Amendment Reporting Contribution
Preelection (failure to timely report)	July 1, 2014 – September 30, 2014	A \$200 Contribution from Corso was not timely reported	A \$1,000 in-kind contribution from Oceanside Associates was not timely reported	October 6, 2014	October 6, 2014	July 15, 2015, Corso amended to include in-kind contribution but she reported the office space as valued at \$1,000 for 6 months instead of \$1,000 for the reporting period, which would have been accurate.

Failure to Timely File Preelection and Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Aggravating Factors:
Preelection	October 1, 2014 – October 18, 2014	October 23, 2014	October 27, 2014	<p>In aggravation, a \$581 in-kind contribution from Oceanside Associates was not reported on the preelection statement when it was filed. Instead it was reported on an amendment to the semi-annual statement ending December 31, 2014.²⁴</p> <p>In aggravation, Corso for Council used the reporting period of Oct 1, 2014 – October 22, 2014, instead of the correct reporting period, which was October 1, 2014 – October 18, 2014.</p>

²⁴ The in-kind contribution totals the amount incurred during the period. For example, the total for the month was \$1,000, but amount incurred during the period was \$581.

1 2 3 4 5 6	Semi-Annual (Failure to timely file)	October 19, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	In aggravation, once Corso filed she over-reported the loans she made to the campaign by \$2,010. FTB determined Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no transactions that matched Corso's reported amount. In aggravation, a \$919 in-kind contribution from Oceanside Associates was not timely reported
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Late Contribution Reports

Date Received	Contributor	Amount	Date Filed
September 30, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed
October 1, 2014	Bernard Blom	\$1,000 in total monetary contributions	Not filed
October 31, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed

Taxpayers for Oceanside

Taxpayers for Oceanside failed to timely file the following statements:

Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Activity ²⁵
Semi-Annual	July 1 2013 – December 31, 2013	January 31, 2014	March 27, 2014	Contrib: \$321 Expend: \$541
Semi-Annual	January 1, 2014 – June 30, 2014	July 31, 2014	October 27, 2014	Contrib: \$491 Expend: \$467
Semi-Annual	July 1, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Contrib: \$1,176 Expend: \$760

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²⁵ Amounts are based on filed campaign statements.

1 Corso's Control of Taxpayers for Oceanside

2 In addition to controlling Corso for Council, Corso also controlled Taxpayers for Oceanside.
3 According to the Act, a candidate controls a committee if he or she, his or her agent, or any other
4 committee he or she controls has a significant influence on the actions or decisions of the committee. The
5 Act does not define "significant influence", but the Commission has advised that a candidate is presumed
6 to exert significant influence "...whenever the candidate is a voting member of a committee's leadership
7 body..." In an interview with Program Specialist Bob Perna ("Perna") of the Fair Political Practices
8 Commission, Corso testified that she has served as treasurer and president of Taxpayers for Oceanside
9 since January of 2013 and is a voting member of the five-person board.²⁶ Based on the Act's definition of
10 a controlled committee, Corso's ability to exert significance influence over the decisions of Taxpayers for
11 Oceanside means that she controlled Taxpayers for Oceanside.

12 As a result of Corso controlling Taxpayers for Oceanside – Taxpayers for Oceanside was required
13 to change the committee's name on the statement of organization to include the controlling candidate's
14 last name, the office being sought, and the year of the election. Taxpayers for Oceanside was also required
15 to file preelection statements because it was being controlled by Corso. Therefore, Taxpayers for
16 Oceanside violated the Act by failing to amend its statement of organization to include Corso's last name
17 and by failing to file preelection statements covering the reporting periods of July 1, 2014 – September
18 30, 2014 and October 1, 2014 – October 18, 2014.

19 **VIOLATIONS**

20 Count 1: Failure to Timely Report

21 Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a \$1,000
22 in-kind contribution from Oceanside Associates received during the preelection reporting period covering
23 July 1, 2014 – September 30, 2014, due by October 6, 2014, in violation of Government Code Section
24 84211, subdivisions (a), (c), and (f).

25
26 ²⁶ Corso's statement regarding her position is supported by a statement of organization she signed, which lists Corso
as the treasurer and principal officer (president) of Taxpayers for Oceanside.

1 Count 2: Failure to Timely Report

2 Corso for Council and Corso failed timely file a preelection statement covering the reporting
3 period of October 1, 2014 – October 18, 2014, due by October 23, 2014, in violation of Government Code
4 Sections 84200.5, subdivision (a) and 84200.7, subdivision, (a).

5 Count 3: Failure to Timely Report

6 Corso for Council and Corso failed timely file a semi-annual campaign statement covering the
7 reporting period of October 19, 2014 – December 31, 2014, due by February 2, 2015, in violation of
8 Government Code Section 84200.

9 Count 4: Failure to Timely File

10 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
11 contribution in the form of office space from Oceanside Associates on September 30, 2014, in violation
12 of Government Code Sections 84203 and 84203.3, subdivision (b).

13 Count 5: Failure to Timely File

14 Corso for Council and Corso failed to timely file a 24-hour report after receiving contributions
15 from Bernard Blom that aggregated to \$1,000 on October 1, 2014, in violation of Government Code
16 Section 84203.

17 Count 6: Failure to Timely File

18 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
19 contribution in the form of office space from Oceanside Associates on October 31, 2014, in violation of
20 Government Code Section 84203 and 84203.3, subdivision (b).

21 Count 7: Failure to Timely File

22 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
23 covering the reporting period of July 1, 2013 – December 31, 2013, due by January 31, 2014, in violation
24 of Government Code Section 84200.

25 ///

1 Count 8: Failure to Timely File

2 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
3 covering the reporting period of January 1, 2014 – June 30, 2014, due by July 31, 2014, in violation of
4 Government Code Section 84200.

5 Count 9: Failure to Timely File

6 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
7 covering the reporting period of July 1, 2014 – December 31, 2014, in violation of Government Code
8 Section 84200.

9 Count 10: Failure to Amend Statement of Organization

10 Taxpayers for Oceanside and Corso failed to amend its statement of organization to include
11 Corso's last name in the name of the committee on or around August 17, 2014, in violation of Government
12 Code Section 84103 and Regulation 18402, subdivision (c)(1) and (2).

13 Count 11: Failure to Timely File a Preelection Statement

14 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
15 reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014, in violation of Government
16 Code Sections 84200.5 subdivision (b) and 84200.7.

17 Count 12: Failure to Timely File a Preelection Statement

18 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
19 reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014, in violation of Government
20 Code Sections 84200.5 subdivision (b) and 84200.7.

21 **EXCULPATORY AND MITIGATING INFORMATION**

22 In mitigation, Corso for Council, Taxpayers for Oceanside, and Corso have never been penalized
23 for violating the Act.

24 In mitigation, Corso for Council timely filed 24-hour reports for three other contributions totaling
25 \$8,000.

26 ///

1 **CONCLUSION**

2 Probable cause exists to believe Corso for Council and Corso committed six violations of the Act
3 as set forth above in Counts 1 – 6. Probable Cause exists to believe that Taxpayers for Oceanside and
4 Corso committed six violations of the Act as set forth above in Counts 7 – 12. The Enforcement Division
5 respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.
6

7 Dated: 9/4/18

8 Respectfully Submitted,

9 **FAIR POLITICAL PRACTICES COMMISSION**

10 Galena West
11 Chief of Enforcement

12 
13 By: Michael W. Hamilton
14 Commission Counsel
15 Enforcement Division
16
17
18
19
20
21
22
23
24
25
26
27

Exhibit A-2

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Sacramento, California 95811. On 11/21/18, I served the following document(s):

1. Letter dated September 4, 2018, from Michael W. Hamilton;
2. FPPC No. 15/245 Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission; and
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By personal service. At 9:04 (a.m./p.m.):

I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

I am a resident or employed in the county where the mailing occurred. The documents were emailed in Sacramento County, California.

SERVICE LIST

Dana Corso
Individually, and o/b/o
Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods
[REDACTED]

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 4/10/19.



Suzanna Gevorkyan

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number (if applicable), and address) Fair Political Practices Commission 1102 Q Street, Suite 3000 Sacramento CA 95811 Telephone Number: 916-322-5772 ATTORNEY FOR (Name) Plaintiff	FOR COURT USE ONLY
Insert name of Court, and Judicial District and Branch Court: Before The Fair Political Practices Commission State Of California	
PLAINTIFF: Fair Political Practices Commission DEFENDANT: Dana Corso, et al	
PROOF OF SERVICE	Case Number: _____

1. At the time of service I was at least 18 years of age and not a party to this action:

2. I served the following document(s) Letter To Plaintiff, Report In Support Of A Finding of Probable Cause, Probable Cause Fact Sheet, Probable Cause Statutes, and Probable Cause Regulations

3. a. Party served: Dana Corso

b. Person served: party in item 3.a. Elizebeth Doe, Receptionist authorized to accept service

4. Address where the party was served: Village Property Management Inc, 5256 S MISSION RD STE 310, BONSALL, CA 92003

5. I served the party by: Substitute Service

I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on: (date): 11/30/2018 (2) at (time): 2:50:00 PM

I thereafter mailed by First Class, (postage prepaid) copies of the documents to the person served at the place where the copies were left (Code Civil Procedure 415.20. I mailed the documents on: 12-1-18

6. The notice to the person served (on the summons) was completed as follows: a.

7. Person who served papers: a. (name): Jorge Varela

b. American Process Service

5491 Shattuck Ave

Fremont, CA 94555

c. phone: 510-383-6173

d. The fee for service was: \$ 50.00

e. I am a registered California process server

f. Registration #: 1203 County of Alameda

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Date: 11/30/2018

Jorge Varela
(Print Name)


(Signature Of Server)

PROOF OF SERVICE

Affidavit of Process Server

FAIR POLITICAL PRACTICES COMMISSION

(NAME OF COURT)

IN THE MATTER OF CORSO FOR CITY COUNCIL 15/245
PLAINTIFF/PETITIONER DEFENDANT/RESPONDENT CASE NUMBER

I MANFRED ARNOLD BRIESE JR., being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said service.

Service: I served NON-SERVICE - DANA CORSO
NAME OF PERSON / ENTITY BEING SERVED

with (list documents) LETTER; REPORT IN SUPPORT OF FINDING OF PROBABLE CAUSE

by leaving with _____ At _____
NAME RELATIONSHIP
 Residence [REDACTED] [REDACTED]
ADDRESS CITY / STATE
 Business _____
ADDRESS CITY / STATE

On _____ AT _____
DATE TIME

Inquired if subject was a member of the U.S. Military and was informed they are not.

Thereafter copies of the documents were mailed by prepaid, first class mail on _____ DATE
from _____ CITY STATE ZIP

Manner of Service:

- Personal:** By personally delivering copies to the person being served.
- Substituted at Residence:** By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household over the age of _____ and explaining the general nature of the papers.
- Substituted at Business:** By leaving, during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof.
- Posting:** By posting copies in a conspicuous manner to the front door of the person/entity being served.

Non-Service: After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

- Unknown at Address
- Moved, Left no Forwarding
- Service Cancelled by Litigant
- Unable to Serve in Timely Fashion
- Address Does Not Exist
- Other ***SEE ATTACHED DECLARATION

Service Attempts: Service was attempted on: (1) _____ (2) _____
DATE TIME DATE TIME
(3) _____ (4) _____ (5) _____
DATE TIME DATE TIME DATE TIME

Description: Age _____ Sex _____ Race _____ Height _____ Weight _____ Hair _____ Beard _____ Glasses _____

I DECLARE UNDER PENALTY OF PERJURY THE FOREGOING IS TRUE AND CORRECT.

SIGNATURE OF PROCESS SERVER
Manfred Arnold Briese, Jr.

**SAN DIEGO SERVICE OF PROCESS
2445 MORENA BLVD. STE. 201
SAN DIEGO, CA 92110**

PLAINTIFF/PETITIONER: IN THE MATTER OF DEFENDANT/RESPONDENT: CORSO FOR CITY COUNCIL	CASE NUMBER: 15/245
--	------------------------

DECLARATION

(This form must be attached to another form or court paper before it can be filed in court.)

I, MANFRED ARNOLD BRIESE JR., am a registered process server and am employed in the county of San Diego. I am aware of the facts presented below. After due and diligent effort, I have been unable to effect personal service on the below- named subject. A list of dates, times and attempts at service is as follows:

SERVEE: DANA CORSO

ADDRESS: [REDACTED]

SERVICE ATTEMPTS AND RESULTS:

11/21/2018 at 7:33pm - No response at door. House dark. Large dog barking inside. Left contact card on door.

11/23/2018 at 6:41pm - No response at door. House dark. White Ford truck in driveway. Different shoes on porch from last attempt.

11/24/2018 at 8:46am - No response at door. Truck gone. Card was ripped up and left where I left it.

11/26/2018 at 7:30pm - No response at door. No movement. Heard dog inside.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 11/29/2018

MANFRED ARNOLD BRIESE JR.

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

Attorney for Plaintiff Petitioner Defendant
 Respondent Other (Specify):

SAN DIEGO CO. #3261

Exhibit A-3



FAIR POLITICAL PRACTICES COMMISSION

1102 Q St • Suite 3000 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

September 4, 2018

CERTIFIED MAIL

Dana Corso
Individually, and o/b/o
Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods
[REDACTED]

In the Matter of Corso for City Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso; FPPC No. 15/245

Dear Ms. Corso:

The Enforcement Division of the Fair Political Practices Commission is proceeding with an administrative action against you for your failure to comply with the filing and disclosure provisions of the Political Reform Act (the "Act"), as described in our previous correspondence dated April 23, 2018. The enclosed Report in Support of a Finding of Probable Cause (the "Report") contains a summary of the alleged violations and the relevant law and evidence.

You have the right to file a written response to the Report. That response may contain any information you think is relevant and that you wish to bring to the attention of the Commission's Hearing Officer. In your response, please indicate whether you would like the Hearing Officer to make a determination of probable cause based on the written materials alone (the Report and your response) or request a conference, during which you may orally present your case to the Hearing Officer. Probable cause conferences are held in our office which is located at 1102 Q Street, Sacramento, CA 95811. You may appear at the conference in person or by telephone and you are entitled to be represented by counsel. *If you wish to submit a written response or request a probable cause conference, it must be filed with the Commission Assistant at the address listed above within 21 days from the date of service of this letter.*

Please note that probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether there is probable cause to believe that the Act was violated. However, settlement discussions are encouraged by the Commission and may take

place at any time except during a probable cause conference. ***If you are interested in reaching a settlement in this matter, please contact Michael W. Hamilton at (916) 322-5772 or mhamilton@fppc.ca.gov.***

Finally, you have the right to request discovery of the evidence in possession of, and relied upon by, the Enforcement Division. ***This request must also be filed with the Commission Assistant within 21 days from the date of service of this letter.*** Should you request discovery, the Enforcement Division will provide the evidence by service of process or certified mail. From the date you are served with the evidence, you would have an additional 21 days to file a written response to the Report, just as described above.

Should you take no action within 21 days from the date of service of this letter, your rights to respond and to request a conference are automatically waived and the Enforcement Division will independently pursue the issuance of an accusation.

For your convenience, I have enclosed a fact sheet on probable cause proceedings and copies of the most relevant statutes and regulations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael W. Hamilton", is written over the typed name.

Michael W. Hamilton
Commission Counsel
Enforcement Division

Enclosures (3)

PROBABLE CAUSE FACT SHEET

INTRODUCTION

The Fair Political Practices Commission is required by law to determine whether probable cause exists to believe that the Political Reform Act (the "Act") was violated before a public administrative accusation may be issued.

The probable cause proceedings before the Fair Political Practices Commission are unique, and most respondents and their attorneys are unfamiliar with them. Therefore, we have prepared this summary to acquaint you with the process.

THE LAW

Government Code sections 83115.5 and 83116 set forth the basic requirement that a finding of probable cause be made in a "private" proceeding before a public accusation is issued and a public hearing conducted in accordance with the Administrative Procedure Act.

The Commission has promulgated regulations further defining the probable cause procedure and delegating to the General Counsel (the "Hearing Officer" for purposes of these proceedings) the authority to preside over such proceedings and decide probable cause. A copy of these statutes and regulations are attached for your convenience.

In summary, the statutes and regulations entitle you to the following:

- a) A written probable cause report containing a summary of the law alleged to have been violated, and a summary of the evidence, including any exculpatory and mitigating information and any other relevant material and arguments;
- b) The opportunity to request discovery, respond in writing, and to request a probable cause conference within 21 days of service of the probable cause report;
- c) If the Commission met to consider whether a civil lawsuit should be filed in this matter, a copy of any staff memoranda submitted to the Commission and a transcript of staff discussions with the Commission at any such meeting; and
- d) If a timely request was made, a non-public conference with the General Counsel and the Enforcement Division staff to consider whether or not probable cause exists to believe the Act was violated.

THE PROCEDURE

Probable Cause Report

Administrative enforcement proceedings are commenced with the service, by registered or certified mail or in person, of a probable cause report. The report will contain a summary of the law and the evidence, including any exculpatory and mitigating information of which the staff has knowledge and any other relevant material and arguments. It is filed with the Hearing Officer.

Discovery

Within 21 calendar days following the service of the probable cause report, you may request discovery of the evidence in the possession of the Enforcement Division. This is not a right to full discovery of the Enforcement Division file, but to the evidence relied upon by the Division along with any exculpatory or mitigating evidence¹.

This request must be sent by registered or certified mail to the Commission Assistant.

Response to Probable Cause Report

Within 21 calendar days following the service of the probable cause report (or, if you timely requested discovery, within 21 calendar days from the service of the evidence) you may submit a response to the Report. By regulation, the written response may contain, "... a summary of evidence, legal arguments, and any mitigating or exculpatory information." (Cal. Code Regs., tit. 2, § 18361.4, subd. (c).)

You must file your response with the Commission Assistant and provide a copy, by service of process or registered or certified mail with return receipt requested, to all other proposed respondents listed in the probable cause report.

Staff Reply

Within 10 calendar days following the date the response was filed with the Commission Assistant, Commission staff may submit any evidence or argument in rebuttal. You will be served with a copy of any such reply.

Probable Cause Conference

Probable cause conferences are held at the offices of the Fair Political Practices Commission, which is located at 1102 Q Street, Sacramento, CA 95811. You may appear at the conference in person or by telephone. The proceedings are not public unless all proposed respondents agree to open the conference to the public. Otherwise, the probable cause report, any written responses, and the probable cause conference itself are confidential.

Unless the probable cause conference is public, the only persons who may attend are the staff of the Commission, any proposed respondent and his or her attorney or representative, and, at the discretion of the Hearing Officer, witnesses.

The Hearing Officer may, but need not, permit testimony from witnesses. Probable cause conferences are less formal than court proceedings. The rules of evidence do not apply. The conferences will be recorded and a copy of the recording will be provided upon request.

Since it has the burden of proof, the Enforcement Division is permitted to open and close the conference presentations. The Hearing Officer may also hold the record open to receive additional evidence or arguments.

Probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether or not there is probable cause to believe that the

¹ But see Title 2, California Code of Regulations, Section 18362, which states that the Commission provides access to complaints, responses to complaints, and investigative files and information in accordance with the requirements of the Public Records Act. (Govt. Code § 6250, et seq.)

Political Reform Act was violated. Anyone who wishes to discuss settlement with the Enforcement Division may do so before or after the probable cause conference but not during the conference.

Pursuant to Title 2, California Code of Regulations, Section 18361.4, subdivision (e), the Hearing Officer will find probable cause "if the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation."

Ordinarily, probable cause determinations are made based upon the written probable cause report, any written response by the respondent, any written reply by the Enforcement Division, and the oral arguments presented at the conference. Timely written presentations are strongly recommended.

Probable Cause Order and Accusation

Once the matter is submitted to the Hearing Officer, the probable cause decision will normally be made within ten days. If the Hearing Officer finds probable cause, he will issue a Finding of Probable Cause, which will be publicly announced at the next Commission Meeting. An accusation will be issued soon after the Finding of Probable Cause is publicly announced.

Continuances

Every reasonable effort is made to accommodate the schedules of parties and counsel. However, once a date has been set it is assumed to be firm and will not be continued except upon the order of the Hearing Officer after a showing of good cause. Settlement negotiations will be considered good cause only if the Hearing Officer is presented with a fully executed settlement, or is convinced that settlement is imminent.

Settlements

Settlement discussions may take place at any time except during the probable cause conference. In order to open settlement discussions, a proposed respondent or his or her counsel or representative should present a written offer to settle stating, where appropriate, the violations to be admitted, and the monetary penalty or other remedy to be tendered.

The Enforcement Division attorney assigned to the case will negotiate any potential settlement on behalf of the Fair Political Practices Commission, and will draft the language of the settlement agreement. The Hearing Officer will not directly participate in the negotiations, but will be represented by Enforcement Division attorneys. Staff attorneys will present settlement offers to the Hearing Officer for his/her approval.

CONCLUSION

This fact sheet was intended to give you a brief summary of the probable cause process at the Fair Political Practices Commission. Such a summary cannot answer every question that might arise in such proceedings. Therefore, if you have any questions that are not addressed by this fact sheet or the copies of the law and regulations we have attached, feel free to contact the attorney whose name appears on the probable cause report.

Attachments: Relevant Sections of (1) California Government Code , and (2) Regulations of the Fair Political Practices Commission, Title 2, Division 6 of the California Code of Regulations.

CALIFORNIA GOVERNMENT CODE

Probable Cause Statutes

§ 83115.5. Probable cause; violation of title; notice of violation; summary of evidence; notice of rights; private proceedings

No finding of probable cause to believe this title has been violated shall be made by the commission unless, at least 21 days prior to the commission's consideration of the alleged violation, the person alleged to have violated this title is notified of the violation by service of process or registered mail with return receipt requested, provided with a summary of the evidence, and informed of his right to be present in person and represented by counsel at any proceeding of the commission held for the purpose of considering whether probable cause exists for believing the person violated this title. Notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office. A proceeding held for the purpose of considering probable cause shall be private unless the alleged violator files with the commission a written request that the proceeding be public.

§ 83116. Violation of title; probable cause; hearing; order

When the Commission determines there is probable cause for believing this title has been violated, it may hold a hearing to determine if a violation has occurred. Notice shall be given and the hearing conducted in accordance with the Administrative Procedure Act (Chapter 5 (commencing with Section 11500), Part 1, Division 3, Title 2, Government Code). The Commission shall have all the powers granted by that chapter. When the Commission determines on the basis of the hearing that a violation has occurred, it shall issue an order that may require the violator to do all or any of the following:

- (a) Cease and desist violation of this title.
- (b) File any reports, statements, or other documents or information required by this title.
- (c) Pay a monetary penalty of up to five thousand dollars (\$5,000) per violation to the General Fund of the state. When the Commission determines that no violation has occurred, it shall publish a declaration so stating.

**REGULATIONS OF THE FAIR POLITICAL PRACTICES COMMISSION
TITLE 2, DIVISION 6 OF THE CALIFORNIA CODE OF REGULATIONS**

Probable Cause Regulations

§ 18361 (b). Delegation by the Executive Director Pertaining to Enforcement Proceedings and Authority to Hear Probable Cause Proceedings.

Probable cause proceedings under Regulation 18361.4 shall be heard by the General Counsel or an attorney from the Legal Division. The General Counsel may delegate the authority to hear probable cause proceedings, in writing, to an administrative law judge.

§ 18361.4. Probable Cause Proceedings

(a) Probable Cause Report. If the Chief of the Enforcement Division decides to commence probable cause proceedings pursuant to Sections 83115.5 and 83116, he or she shall direct the Enforcement Division staff to prepare a written report, hereafter referred to as "the probable cause report." The probable cause report shall contain a summary of the law and evidence gathered in connection with the investigation, including any exculpatory and mitigating information of which the staff has knowledge and any other relevant material and arguments. The evidence recited in the probable cause report may include hearsay, including declarations of investigators or others relating the statements of witnesses or concerning the examination of physical evidence.

(b) No probable cause hearing will take place until at least 21 calendar days after the Enforcement Division staff provides the following, by service of process or registered or certified mail with return receipt requested, to all proposed respondents:

- (1) A copy of the probable cause report;
- (2) Notification that the proposed respondents have the right to respond in writing to the probable cause report and to request a probable cause conference at which the proposed respondent may be present in person and represented by counsel, and;
- (3) If the Commission met in executive session on this matter pursuant to Regulation 18361.2, a copy of any staff memoranda submitted to the Commission at that time along with the recording of any discussion between the Commission and the staff at the executive session as required in subdivision (b) of Regulation 18361.2.

(c) Response to Probable Cause Report.

- (1) Each proposed respondent may submit a written response to the probable cause report. The response may contain a summary of evidence, legal arguments, and any mitigating or exculpatory information. A proposed respondent who submits a response must file it with the Commission Assistant who will forward the response to the General Counsel or an attorney in the Legal Division (the "hearing officer") and provide a copy, by service of process or registered or certified mail with return receipt requested, to all other proposed respondents listed in the probable cause report not later than 21 days following service of the probable cause report.
- (2) Within 21 calendar days following the service of the probable cause report, a proposed

respondent may request discovery of evidence in the possession of the Enforcement Division. This request must be sent by registered or certified mail to the Commission Assistant. Upon receipt of the request, the Enforcement Division shall provide discovery of evidence relied upon by the Enforcement Division sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation, along with any exculpatory or mitigating evidence. This is not a right to full discovery of the Enforcement Division file. The Enforcement Division shall provide access to documents for copying by the Respondent, or upon agreement among the parties, the Enforcement Division will provide copies of the requested documents upon payment of a fee for direct costs of duplication. The Enforcement Division shall provide such evidence by service of process or registered or certified mail with return receipt requested to all respondents, with a copy to the Commission Assistant. A respondent may submit a written response to the probable cause report described in subsection (1) no later than 21 calendar days after service of discovery.

- (3) The Commission staff may submit any evidence or argument in rebuttal to the response. When the Commission staff submits evidence or argument in rebuttal to the response, it shall provide a copy, by service of process or registered or certified mail with return receipt requested, to all proposed respondents listed in the probable cause report not later than 10 calendar days following the date the response was filed with the Commission Assistant. The hearing officer may extend the time limitations in this section for good cause. At any time prior to a determination of probable cause, the hearing officer may allow additional material to be submitted as part of the initial response or rebuttal.

(d) Probable Cause Conference. Any proposed respondent may request a probable cause conference. The request shall be served upon the Commission Assistant and all other proposed respondents not later than 21 days after service of the probable cause report unless the hearing officer extends the time for good cause. The Commission Assistant shall fix a time for the probable cause conference and the hearing officer shall conduct the conference informally. The conference shall be closed to the public unless a proposed respondent requests and all other proposed respondents agree to a public conference. If the conference is not public, only members of the Commission staff, any proposed respondent and his or her legal counsel or representative shall have the right to be present and participate. The hearing officer may allow witnesses to attend and participate in part or all of the probable cause conference. In making this determination, the hearing officer shall consider the relevancy of the witness' proposed testimony, whether the witness has a substantial interest in the proceedings, and whether fairness requires that the witness be allowed to participate. Representatives of any civil or criminal prosecutor with jurisdiction may attend the conference at the discretion of the hearing officer if they agree to respect the confidential nature of the proceedings. If the conference is not open to the public and none of the parties and the presiding officer object, the conference may be conducted in whole or in part by telephone. The probable cause conference shall be recorded. The hearing officer may determine whether there is probable cause based solely on the probable cause report, any responses or rebuttals filed and any arguments presented at the probable cause conference by the interested parties. If the hearing officer requires additional information before determining whether there is probable cause, he or she may permit any party to submit additional evidence at the probable cause conference.

(e) Finding of Probable Cause. The hearing officer may find there is probable cause to believe a violation has occurred if the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation. A finding of probable cause by the hearing officer does not constitute a finding that a violation has actually occurred. The hearing officer shall not make a finding of probable cause if he or she is presented with clear and convincing evidence that, at a time prior to the alleged violation, the violator consulted with the staff of the Commission in good faith, disclosed truthfully all the material facts, and committed the acts complained of either in reliance on the advice of the staff or because of the staff's failure to provide advice. If the hearing officer makes a finding of probable cause, the Enforcement Division shall prepare an Accusation pursuant to Section 11503 and have it served upon the person or persons who are subjects of the probable cause finding. The hearing officer shall publicly announce the finding of probable cause. The announcement shall contain a summary of the allegations and a cautionary statement that the respondent is presumed to be innocent of any violation of the Act unless a violation is proved in a subsequent proceeding. The Chief of the Enforcement Division shall be responsible for the presentation of the case in support of the Accusation at an administrative hearing held pursuant to Section 83116.

§ 18362. Access to Complaint Files

(a) Access to complaints, responses thereto, and investigative files and information shall be granted in accordance with the requirements of the Public Records Act (Government Code Section 6250, et seq.).

(b) When release of material is requested pursuant to subdivision (a), the Executive Director, or his or her designee, shall review the material prior to its release or prior to a claim of exemption to determine that the requirements of the Public Records Act have been satisfied.

(c) Any person requesting copies of material pursuant to subdivision (a) shall reimburse the Commission \$0.10 per page for each page copied or supply copying equipment and make copies in the offices of the Commission. Documents may not be removed from the offices of the Commission. If the request is for copies totaling ten pages or less, the copies shall be provided without charge for copying since the administrative costs do not warrant collection of \$1.00 or less. If the request is for copies totaling more than ten pages, reimbursements of copying costs shall include the cost for the first ten pages. Charges imposed pursuant to this subdivision are for the purpose of recovering the cost of copying.

(d) Requests for access and copies pursuant to subdivision (a) shall be made in writing and shall specifically identify the documents sought.

§ 18361.2. Memorandum Respecting Civil Litigation.

(a) If the Executive Director concludes civil litigation should be initiated, he or she shall submit to the Commission a written memorandum, which shall be first reviewed by the General Counsel, or an attorney from the Legal Division, summarizing the facts and the applicable law of the case and recommending the initiation of a lawsuit. The memorandum shall include all exculpatory and mitigating information known to the staff.

(b) The Commission shall review the memorandum at an executive session. The General Counsel, or an attorney from the Legal Division, and the Commission Assistant shall be in attendance. No other member of the staff may be present unless the Commission meets with a member of the staff for that person to answer questions. The Commission may not resume its deliberations until the person is no longer present. Any communication between the Commission and the person during the executive session shall be recorded. After review of the memorandum, the Commission may direct the Executive Director to do any of the following:

- (1) Initiate civil litigation.
- (2) Decide whether probable cause proceedings should be commenced pursuant to 2 Cal. Code of Regulations Section 18361.4.
- (3) Return the matter to the staff for further investigation.
- (4) Take no further action on the matter or take any other action it deems appropriate.

(c) If the Commission decides to initiate civil litigation, the Commission may then permit other members of the staff to attend the executive session.

(d) If the Executive Director deems it necessary, he or she may call a special meeting of the Commission to review a staff memorandum recommending the initiation of civil litigation.

(e) It is the intent of the Commission in adopting this section to preserve for the members of the Commission the authority to decide whether alleged violations should be adjudicated in administrative hearings or in civil litigation, while at the same time avoiding the possibility that discussions with members of the staff might cause members of the Commission to prejudge a case that might be heard by the Commission under Government Code Section 83116.

Exhibit A-4

1 The Political Reform Act (the "Act")¹ requires committees and candidates to do the following: timely file
2 semi-annual campaign statements by July 31 and January 31 of each year, timely file prelection
3 statements, timely report the receipt of contributions on all campaign statements, and it requires 24-hour
4 reports to be filed within 24-hours of receiving or making a late contribution in the 90 days leading up to
5 an election. Furthermore, the Act prohibits a candidate from making expenditures out of any bank account
6 other than the one designed for campaign activity on their statement of organization.

7 Corso for Council and Corso violated the Act by failing to timely report the receipt of
8 contributions, failing to timely file a preelection statement, failing to timely file a semi-annual statement,
9 and by failing to timely file 24-hour reports.

10 Taxpayers for Oceanside and Corso violated the Act by failing to timely file four semi-annual
11 campaign statements, failing to timely file an amendment to its statement of organization, and failing to
12 timely file two preelection campaign statements.

13 This probable cause report is being amended to change the subdivisions from (a) to (b) in count 2
14 and subdivision (b) was added to Section 84200.7 in counts 11 and 12. Additionally, in law section
15 pertaining to the liability, the treasurer was included on line 15.

16 SUMMARY OF THE LAW

17 All legal references and discussions of law pertain to the Act's provisions as they existed at the
18 time of the violations.

19 Jurisdiction

20 The Fair Political Practices Commission (the "Commission") has administrative jurisdiction to
21 enforce the provisions of the Act.²

22 Probable Cause Proceedings

23 Prior to the Enforcement Division commencing an administrative action, the General Counsel of
24 the Commission or her designee (the "hearing officer"), must make a finding that there is probable cause

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

² Section § 83116.

1 to believe the respondent has violated the Act.³ After a finding of probable cause, the Commission may
2 hold a noticed hearing in accordance with the Administrative Procedure Act⁴ to determine whether
3 violations occurred, and levy an administrative penalty of up to \$5,000 for each violation.⁵

4 Standard for Finding Probable Cause

5 To make a finding of probable cause, the hearing officer must be presented with sufficient
6 evidence to lead a person of ordinary caution and prudence to believe, or entertain a strong suspicion,
7 that a respondent committed or caused a violation.⁶

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

9 When enacting the Political Reform Act, the people of the state of California found and declared
10 that previous laws regulating political practices suffered from inadequate enforcement by state and local
11 authorities.⁷ To that end, the Act must be liberally construed to achieve its purposes.⁸

12 Controlled Committee

13 Under the Act, a controlled committee is defined as a "...committee that is controlled directly or
14 indirectly by a candidate or state measure proponent or that has acted jointly with a candidate, controlled
15 committee, or state measure proponent in connection with the making of expenditures. A candidate or
16 state measure proponent controls a committee if he or she, his or her agent, or any other committee he or
17 she controls has a significant influence on the actions or decisions of the committee."⁹ Under the Act,
18 there is not a definition of "significant influence", but the Commission has advised that a candidate is
19 presumed to exert significant influence "...whenever the candidate is a voting member of a committee's
20 leadership body..."¹⁰

22 ³ Section 83115.5, and Reg. 18361 and 18361.4.

23 ⁴ Section 11500, et seq.

24 ⁵ Section 83116, and Reg. 18361.4, subdivision. (e).

25 ⁶ Reg. 18361.4, subdivision. (e).

26 ⁷ Section 81001, subdivision (h).

27 ⁸ Section 81003.

28 ⁹ Section 82016, subdivision (a).

¹⁰ *Ferguson* Advice Letter, No. A-86-044. FPPC advice letters are issued pursuant to Government Code section 83114, subdivision (b), and California Code of Regulations, title 2, section 18329. They offer guidance to the public, and under certain circumstances, the requestor may use the advice as a defense in an enforcement proceeding. Although the ultimate resolution

1 Semi-Annual Campaign Statements

2 The Act requires candidates and committees to file semi-annual statements each year "...no later
3 than July 31 for the period ending June 30, and no later than January 31, for the period ending December
4 31..."¹¹ However, if the due date falls on a Saturday, Sunday, or official state holiday, "the filing deadline
5 for such a statement or report shall be extended to the next regular business day."¹²

6 Preelection Campaign Statement

7 The Act states that "All candidates appearing on the ballot to be voted on at the next election, their
8 controlled committees, and committees primarily formed to support or oppose an elected officer,
9 candidate, or measure appearing on the ballot to be voted on at the next election shall file the applicable
10 preelection statements."¹³ A candidate and their controlled committee are required to file a preelection
11 statement on October 5 for the period ending September 30 and for the period ending 17 days before an
12 election the statement shall be filed no later than 12 days before the election.¹⁴

13 Contents of a Campaign Statement

14 The Act requires each campaign statement to contain information pertaining to the total amount of
15 contributions received during the applicable period, the total amount of expenditures made during the
16 applicable period, and the name, street address, occupation, and employer of any contributor that has made
17 contributions totaling more than \$100 in the applicable period.¹⁵

18 Statement of Organization Amendments

19 The Act requires committees to file an amendment statement of organization within ten days to
20 reflect any changes.¹⁶

21 ///

22
23 of legal issues regarding statutory interpretation lies with the courts, the advice of the FPPC as an agency empowered by the
Legislature to interpret and enforce the Political Reform Act is entitled to weight.

24 ¹¹ Section 84200, subdivision (a).

25 ¹² Regulation 18116, subdivision (a).

26 ¹³ Section 84200.5, subdivision (b)

27 ¹⁴ Section 84200.7, subdivision (b)(1) and (2).

28 ¹⁵ Section 84211, subdivisions (a), (b), and (f).

¹⁶ Section 84103.

1 Naming a Controlled Committee

2 The Act requires the name of a candidate controlled committee to include the last name of the
3 controlling candidate, the office sought, and the year of the election.¹⁷

4 24-Hour Reports

5 Under the Act, a late contribution is defined as “A contribution, including a loan, that totals in the
6 aggregate one thousand dollars (\$1,000) or more and is made to or received by a candidate, a controlled
7 committee, or a committee formed or existing primarily to support or oppose a candidate or measure
8 within 90 days before the date of the election...”¹⁸ A candidate or committee that receives or makes a late
9 monetary contribution is required to report within 24-hours the receipt or making of a late contribution.¹⁹
10 Additionally, a candidate or committee that makes or receives a late in-kind contribution shall report that
11 activity within 48 hours of making or receiving a late in-kind contribution.²⁰

12 Candidate and Treasurer Liability

13 Under the Act, it is the duty of the candidate and treasurer of a controlled committee to ensure that
14 the committee complies with all the requirements of the Act concerning the receipt, expenditure, and
15 reporting of funds.²¹ The candidate and treasurer may be held jointly and severally liable, along with the
16 committee, for violations committed by the committee.²²

17 Liability for Violations

18 Under the Act, “Any person who violates any provision of this title, who purposely or negligently
19 causes any other person to violate any provision of this title, or who aids and abets any other person in the
20 violation of this title shall be liable... This section shall only apply to persons who have filing or reporting
21
22

23
24 ¹⁷ Former Regulation 18402, subdivision (c)(1) and (2).
¹⁸ Former Section 82036, subdivision (a).
25 ¹⁹ Section 84203, subdivision (a) and (b).
²⁰ Section 84203.3, subdivision (b).
26 ²¹ Sections 81004, 84100 84213, and Regulation 18427.
²² Sections 83116.5 and 91006.

1 obligations under this title, or who are compensated for services involving the planning, organizing, or
2 directing any activity regulated or required by this title...”²³

3 **SUMMARY OF THE EVIDENCE**

4 On November 4, 2014, Corso was an unsuccessful candidate in the County of San Diego’s
5 General Election for Oceanside City Council. Corso for Council qualified as a committee on or around
6 August 17, 2014. Corso for Council received approximately \$26,388 in contributions and made
7 approximately \$25,194 in expenditures. At the time Corso was running for city council, Corso was also
8 serving as the treasurer of Taxpayers for Oceanside, which is a role she began on or around March 18,
9 2013. This matter was opened based on an audit of Corso for Council conducted by the California
10 Franchise Tax Board (“FTB”) covering the period of January 1, 2014 – December 31, 2014 and based on
11 several complaints alleging Corso for Council and Taxpayers for Oceanside were not in compliance with
12 the filing requirements of the Act.

13 The FTB found and the Enforcement Division confirmed that Corso for Council violated the Act
14 by failing to timely report contributions, failing to timely file 24-hour reports, and accepting cash
15 contributions. Furthermore, the Enforcement Division determined that Corso was controlling Taxpayers
16 for Oceanside at the same time she was running for Oceanside City Council. Taxpayers for Oceanside
17 violated the Act by failing to timely file four semi-annual campaign statements, failing to timely file an
18 amended statement of organization to change the name of the committee, and failing to timely file two
19 preelection campaign statements

20 Corso for City Council Reporting and Filing

21 During Corso’s 2014 campaign for Oceanside City Council, Corso for Council committed the
22 following reporting and filing violations:

23 ///

24 ///

25 ///

26 ²³ Section 83116.5.

Failure to Timely Report

Statement	Reporting Period	Monetary contributions	In-Kind contributions	Due Date	Date of Filing	Date of Amendment Reporting Contribution
Preelection (failure to timely report)	July 1, 2014 – September 30, 2014	A \$200 Contribution from Corso was not timely reported	A \$1,000 in-kind contribution from Oceanside Associates was not timely reported	October 6, 2014	October 6, 2014	July 15, 2015, Corso amended to include in-kind contribution but she reported the office space as valued at \$1,000 for 6 months instead of \$1,000 for the reporting period, which would have been accurate.

Failure to Timely File Preelection and Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Aggravating Factors:
Preelection	October 1, 2014 – October 18, 2014	October 23, 2014	October 27, 2014	<p>In aggravation, a \$581 in-kind contribution from Oceanside Associates was not reported on the preelection statement when it was filed. Instead it was reported on an amendment to the semi-annual statement ending December 31, 2014.²⁴</p> <p>In aggravation, Corso for Council used the reporting period of Oct 1, 2014 – October 22, 2014, instead of the correct reporting period, which was October 1, 2014 – October 18, 2014.</p>

²⁴ The in-kind contribution totals the amount incurred during the period. For example, the total for the month was \$1,000, but amount incurred during the period was \$581.

1 2 3 4 5 6	Semi-Annual (Failure to timely file)	October 19, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	In aggravation, once Corso filed she over-reported the loans she made to the campaign by \$2,010. FTB determined Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no transactions that matched Corso's reported amount. In aggravation, a \$919 in-kind contribution from Oceanside Associates was not timely reported
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Late Contribution Reports

Date Received	Contributor	Amount	Date Filed
September 30, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed
October 1, 2014	Bernard Blom	\$1,000 in total monetary contributions	Not filed
October 31, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed

Taxpayers for Oceanside

Taxpayers for Oceanside failed to timely file the following statements:

Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Activity ²⁵
Semi-Annual	July 1 2013 – December 31, 2013	January 31, 2014	March 27, 2014	Contrib: \$321 Expend: \$541
Semi-Annual	January 1, 2014 – June 30, 2014	July 31, 2014	October 27, 2014	Contrib: \$491 Expend: \$467
Semi-Annual	July 1, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Contrib: \$1,176 Expend: \$760

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²⁵ Amounts are based on filed campaign statements.

1 Corso's Control of Taxpayers for Oceanside

2 In addition to controlling Corso for Council, Corso also controlled Taxpayers for Oceanside.
3 According to the Act, a candidate controls a committee if he or she, his or her agent, or any other
4 committee he or she controls has a significant influence on the actions or decisions of the committee. The
5 Act does not define "significant influence", but the Commission has advised that a candidate is presumed
6 to exert significant influence "...whenever the candidate is a voting member of a committee's leadership
7 body..." In an interview with Program Specialist Bob Perna ("Perna") of the Fair Political Practices
8 Commission, Corso testified that she has served as treasurer and president of Taxpayers for Oceanside
9 since January of 2013 and is a voting member of the five-person board.²⁶ Based on the Act's definition of
10 a controlled committee, Corso's ability to exert significance influence over the decisions of Taxpayers for
11 Oceanside means that she controlled Taxpayers for Oceanside.

12 As a result of Corso controlling Taxpayers for Oceanside – Taxpayers for Oceanside was required
13 to change the committee's name on the statement of organization to include the controlling candidate's
14 last name, the office being sought, and the year of the election. Taxpayers for Oceanside was also required
15 to file preelection statements because it was being controlled by Corso. Therefore, Taxpayers for
16 Oceanside violated the Act by failing to amend its statement of organization to include Corso's last name
17 and by failing to file preelection statements covering the reporting periods of July 1, 2014 – September
18 30, 2014 and October 1, 2014 – October 18, 2014.

19 **VIOLATIONS**

20 Count 1: Failure to Timely Report

21 Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a \$1,000
22 in-kind contribution from Oceanside Associates received during the preelection reporting period covering
23 July 1, 2014 – September 30, 2014, due by October 6, 2014, in violation of Government Code Section
24 84211, subdivisions (a), (c), and (f).

25 _____
26 ²⁶ Corso's statement regarding her position is supported by a statement of organization she signed, which lists Corso
27 as the treasurer and principal officer (president) of Taxpayers for Oceanside.

1 Count 2: Failure to Timely Report

2 Corso for Council and Corso failed timely file a preelection statement covering the reporting
3 period of October 1, 2014 – October 18, 2014, due by October 23, 2014, in violation of Government Code
4 Sections 84200.5, subdivision (b) and 84200.7, subdivision, (b).

5 Count 3: Failure to Timely Report

6 Corso for Council and Corso failed timely file a semi-annual campaign statement covering the
7 reporting period of October 19, 2014 – December 31, 2014, due by February 2, 2015, in violation of
8 Government Code Section 84200.

9 Count 4: Failure to Timely File

10 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
11 contribution in the form of office space from Oceanside Associates on September 30, 2014, in violation
12 of Government Code Sections 84203 and 84203.3, subdivision (b).

13 Count 5: Failure to Timely File

14 Corso for Council and Corso failed to timely file a 24-hour report after receiving contributions
15 from Bernard Blom that aggregated to \$1,000 on October 1, 2014, in violation of Government Code
16 Section 84203.

17 Count 6: Failure to Timely File

18 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
19 contribution in the form of office space from Oceanside Associates on October 31, 2014, in violation of
20 Government Code Section 84203 and 84203.3, subdivision (b).

21 Count 7: Failure to Timely File

22 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
23 covering the reporting period of July 1, 2013 – December 31, 2013, due by January 31, 2014, in violation
24 of Government Code Section 84200.

25 ///

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27

28

1 Count 8: Failure to Timely File

2 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
3 covering the reporting period of January 1, 2014 – June 30, 2014, due by July 31, 2014, in violation of
4 Government Code Section 84200.

5 Count 9: Failure to Timely File

6 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
7 covering the reporting period of July 1, 2014 – December 31, 2014, in violation of Government Code
8 Section 84200.

9 Count 10: Failure to Amend Statement of Organization

10 Taxpayers for Oceanside and Corso failed to amend its statement of organization to include
11 Corso's last name in the name of the committee on or around August 17, 2014, in violation of Government
12 Code Section 84103 and Regulation 18402, subdivision (c)(1) and (2).

13 Count 11: Failure to Timely File a Preelection Statement

14 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
15 reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014, in violation of Government
16 Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

17 Count 12: Failure to Timely File a Preelection Statement

18 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
19 reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014, in violation of Government
20 Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

21 **EXCULPATORY AND MITIGATING INFORMATION**

22 In mitigation, Corso for Council, Taxpayers for Oceanside, and Corso have never been penalized
23 for violating the Act.

24 In mitigation, Corso for Council timely filed 24-hour reports for three other contributions totaling
25 \$8,000.

26 ///

1 **CONCLUSION**

2 Probable cause exists to believe Corso for Council and Corso committed six violations of the Act
3 as set forth above in Counts 1 – 6. Probable Cause exists to believe that Taxpayers for Oceanside and
4 Corso committed six violations of the Act as set forth above in Counts 7 – 12. The Enforcement Division
5 respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.
6

7 Dated: 2/26/19

8 Respectfully Submitted,

9 **FAIR POLITICAL PRACTICES COMMISSION**

10 Galena West
11 Chief of Enforcement

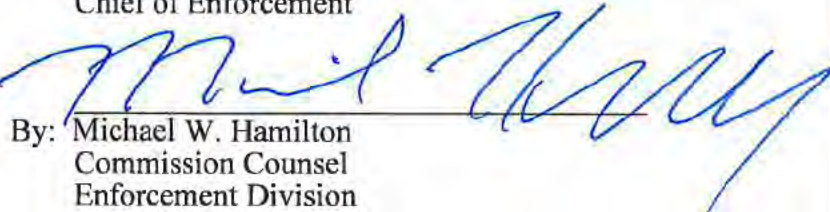
12 
13 By: Michael W. Hamilton
14 Commission Counsel
15 Enforcement Division

Exhibit A-5

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, California 95811. On February 26, 2019, I served the following document(s):

1. Letter dated February 26, 2019, from Michael W. Hamilton;
2. FPPC No. 15/245 Amended Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission; and
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By United States Postal Service. I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the addresses listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Certified Mail, Return Receipt Requested

Dana Corso
Individually, and o/b/o
Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods
5256 South Mission Rd, Suite 310
Bonsall, CA 92003

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on February 26, 2019.

Lominiles Wojewoles

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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OFFICIAL USE

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Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$ _____	
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<input type="checkbox"/> Adult Signature Required \$ _____	
<input type="checkbox"/> Adult Signature Restricted Delivery \$ _____	
Postage \$ _____	
Total Postage and Fees \$ _____	
Sent To Dana Corso Street and Apt. No., or PO Box No. 5256 South Mission Road, Suite 310 City, State, ZIP+4® Bonsall, CA 92003	

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, <p>Dana Corso Individually, and o/b/o Corso for City Council 2014 Taxpayers for Oceanside Neighborhoods 5256 South Mission Road, Suite 310 Bonsall, CA 92003</p>  <p>9590 9402 4215 8121 8981 37</p>	<p>A. Signature <input checked="" type="checkbox"/> <i>D. Corso</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery 7/28</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0040 0000 7989 8252</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input checked="" type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)	
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PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Exhibit A-6



FAIR POLITICAL PRACTICES COMMISSION

1102 Q St • Suite 3000 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

February 26, 2019

CERTIFIED MAIL

Dana Corso
Individually, and o/b/o
Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods
5256 South Mission Rd, Suite 310
Bonsall, CA 92003

In the Matter of Corso for City Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso; FPPC No. 15/245

Dear Ms. Corso:

The Enforcement Division of the Fair Political Practices Commission is proceeding with an administrative action against you for your failure to comply with the filing and disclosure provisions of the Political Reform Act (the "Act"), as described in our previous correspondence dated April 23, 2018. The enclosed Report in Support of a Finding of Probable Cause (the "Report") contains a summary of the alleged violations and the relevant law and evidence.

You have the right to file a written response to the Report. That response may contain any information you think is relevant and that you wish to bring to the attention of the Commission's Hearing Officer. In your response, please indicate whether you would like the Hearing Officer to make a determination of probable cause based on the written materials alone (the Report and your response) or request a conference, during which you may orally present your case to the Hearing Officer. Probable cause conferences are held in our office which is located at 1102 Q Street, Sacramento, CA 95811. You may appear at the conference in person or by telephone and you are entitled to be represented by counsel. ***If you wish to submit a written response or request a probable cause conference, it must be filed with the Commission Assistant at the address listed above within 21 days from the date of service of this letter.***

Please note that probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether there is probable cause to believe that the Act was violated. However, settlement discussions are encouraged by the Commission and may take

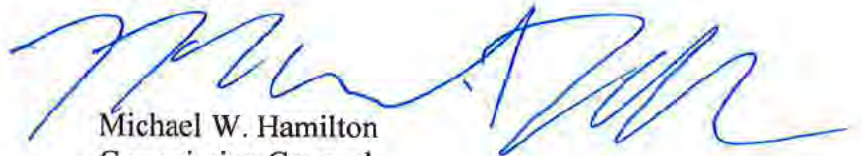
place at any time except during a probable cause conference. ***If you are interested in reaching a settlement in this matter, please contact Michael W. Hamilton at (916) 322-5772 or mhamilton@fppc.ca.gov.***

Finally, you have the right to request discovery of the evidence in possession of, and relied upon by, the Enforcement Division. ***This request must also be filed with the Commission Assistant within 21 days from the date of service of this letter.*** Should you request discovery, the Enforcement Division will provide the evidence by service of process or certified mail. From the date you are served with the evidence, you would have an additional 21 days to file a written response to the Report, just as described above.

Should you take no action within 21 days from the date of service of this letter, your rights to respond and to request a conference are automatically waived and the Enforcement Division will independently pursue the issuance of an accusation.

For your convenience, I have enclosed a fact sheet on probable cause proceedings and copies of the most relevant statutes and regulations.

Sincerely,



Michael W. Hamilton
Commission Counsel
Enforcement Division

Enclosures (3)

PROBABLE CAUSE FACT SHEET

INTRODUCTION

The Fair Political Practices Commission is required by law to determine whether probable cause exists to believe that the Political Reform Act (the "Act") was violated before a public administrative accusation may be issued.

The probable cause proceedings before the Fair Political Practices Commission are unique, and most respondents and their attorneys are unfamiliar with them. Therefore, we have prepared this summary to acquaint you with the process.

THE LAW

Government Code sections 83115.5 and 83116 set forth the basic requirement that a finding of probable cause be made in a "private" proceeding before a public accusation is issued and a public hearing conducted in accordance with the Administrative Procedure Act.

The Commission has promulgated regulations further defining the probable cause procedure and delegating to the General Counsel (the "Hearing Officer" for purposes of these proceedings) the authority to preside over such proceedings and decide probable cause. A copy of these statutes and regulations are attached for your convenience.

In summary, the statutes and regulations entitle you to the following:

- a) A written probable cause report containing a summary of the law alleged to have been violated, and a summary of the evidence, including any exculpatory and mitigating information and any other relevant material and arguments;
- b) The opportunity to request discovery, respond in writing, and to request a probable cause conference within 21 days of service of the probable cause report;
- c) If the Commission met to consider whether a civil lawsuit should be filed in this matter, a copy of any staff memoranda submitted to the Commission and a transcript of staff discussions with the Commission at any such meeting; and
- d) If a timely request was made, a non-public conference with the General Counsel and the Enforcement Division staff to consider whether or not probable cause exists to believe the Act was violated.

THE PROCEDURE

Probable Cause Report

Administrative enforcement proceedings are commenced with the service, by registered or certified mail or in person, of a probable cause report. The report will contain a summary of the law and the evidence, including any exculpatory and mitigating information of which the staff has knowledge and any other relevant material and arguments. It is filed with the Hearing Officer.

Discovery

Within 21 calendar days following the service of the probable cause report, you may request discovery of the evidence in the possession of the Enforcement Division. This is not a right to full discovery of the Enforcement Division file, but to the evidence relied upon by the Division along with any exculpatory or mitigating evidence¹.

This request must be sent by registered or certified mail to the Commission Assistant.

Response to Probable Cause Report

Within 21 calendar days following the service of the probable cause report (or, if you timely requested discovery, within 21 calendar days from the service of the evidence) you may submit a response to the Report. By regulation, the written response may contain, "... a summary of evidence, legal arguments, and any mitigating or exculpatory information." (Cal. Code Regs., tit. 2, § 18361.4, subd. (c).)

You must file your response with the Commission Assistant and provide a copy, by service of process or registered or certified mail with return receipt requested, to all other proposed respondents listed in the probable cause report.

Staff Reply

Within 10 calendar days following the date the response was filed with the Commission Assistant, Commission staff may submit any evidence or argument in rebuttal. You will be served with a copy of any such reply.

Probable Cause Conference

Probable cause conferences are held at the offices of the Fair Political Practices Commission, which is located at 1102 Q Street, Suite 3000, Sacramento, CA 95811. You may appear at the conference in person or by telephone. The proceedings are not public unless all proposed respondents agree to open the conference to the public. Otherwise, the probable cause report, any written responses, and the probable cause conference itself are confidential.

Unless the probable cause conference is public, the only persons who may attend are the staff of the Commission, any proposed respondent and his or her attorney or representative, and, at the discretion of the Hearing Officer, witnesses.

The Hearing Officer may, but need not, permit testimony from witnesses. Probable cause conferences are less formal than court proceedings. The rules of evidence do not apply. The conferences will be recorded and a copy of the recording will be provided upon request.

Since it has the burden of proof, the Enforcement Division is permitted to open and close the conference presentations. The Hearing Officer may also hold the record open to receive additional evidence or arguments.

Probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether or not there is probable cause to believe that the

¹ But see Title 2, California Code of Regulations, Section 18362, which states that the Commission provides access to complaints, responses to complaints, and investigative files and information in accordance with the requirements of the Public Records Act. (Govt. Code § 6250, et seq.)

Political Reform Act was violated. Anyone who wishes to discuss settlement with the Enforcement Division may do so before or after the probable cause conference but not during the conference.

Pursuant to Title 2, California Code of Regulations, Section 18361.4, subdivision (e), the Hearing Officer will find probable cause "if the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation."

Ordinarily, probable cause determinations are made based upon the written probable cause report, any written response by the respondent, any written reply by the Enforcement Division, and the oral arguments presented at the conference. Timely written presentations are strongly recommended.

Probable Cause Order and Accusation

Once the matter is submitted to the Hearing Officer, the probable cause decision will normally be made within ten days. If the Hearing Officer finds probable cause, he will issue a Finding of Probable Cause, which will be publicly announced at the next Commission Meeting. An accusation will be issued soon after the Finding of Probable Cause is publicly announced.

Continuances

Every reasonable effort is made to accommodate the schedules of parties and counsel. However, once a date has been set it is assumed to be firm and will not be continued except upon the order of the Hearing Officer after a showing of good cause. Settlement negotiations will be considered good cause only if the Hearing Officer is presented with a fully executed settlement, or is convinced that settlement is imminent.

Settlements

Settlement discussions may take place at any time except during the probable cause conference. In order to open settlement discussions, a proposed respondent or his or her counsel or representative should present a written offer to settle stating, where appropriate, the violations to be admitted, and the monetary penalty or other remedy to be tendered.

The Enforcement Division attorney assigned to the case will negotiate any potential settlement on behalf of the Fair Political Practices Commission, and will draft the language of the settlement agreement. The Hearing Officer will not directly participate in the negotiations, but will be represented by Enforcement Division attorneys. Staff attorneys will present settlement offers to the Hearing Officer for his/her approval.

CONCLUSION

This fact sheet was intended to give you a brief summary of the probable cause process at the Fair Political Practices Commission. Such a summary cannot answer every question that might arise in such proceedings. Therefore, if you have any questions that are not addressed by this fact sheet or the copies of the law and regulations we have attached, feel free to contact the attorney whose name appears on the probable cause report.

Attachments: Relevant Sections of (1) California Government Code , and (2) Regulations of the Fair Political Practices Commission, Title 2, Division 6 of the California Code of Regulations.

CALIFORNIA GOVERNMENT CODE

Probable Cause Statutes

§ 83115.5. Probable cause; violation of title; notice of violation; summary of evidence; notice of rights; private proceedings

No finding of probable cause to believe this title has been violated shall be made by the commission unless, at least 21 days prior to the commission's consideration of the alleged violation, the person alleged to have violated this title is notified of the violation by service of process or registered mail with return receipt requested, provided with a summary of the evidence, and informed of his right to be present in person and represented by counsel at any proceeding of the commission held for the purpose of considering whether probable cause exists for believing the person violated this title. Notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office. A proceeding held for the purpose of considering probable cause shall be private unless the alleged violator files with the commission a written request that the proceeding be public.

§ 83116. Violation of title; probable cause; hearing; order

When the Commission determines there is probable cause for believing this title has been violated, it may hold a hearing to determine if a violation has occurred. Notice shall be given and the hearing conducted in accordance with the Administrative Procedure Act (Chapter 5 (commencing with Section 11500), Part 1, Division 3, Title 2, Government Code). The Commission shall have all the powers granted by that chapter. When the Commission determines on the basis of the hearing that a violation has occurred, it shall issue an order that may require the violator to do all or any of the following:

- (a) Cease and desist violation of this title.
- (b) File any reports, statements, or other documents or information required by this title.
- (c) Pay a monetary penalty of up to five thousand dollars (\$5,000) per violation to the General Fund of the state. When the Commission determines that no violation has occurred, it shall publish a declaration so stating.

**REGULATIONS OF THE FAIR POLITICAL PRACTICES COMMISSION
TITLE 2, DIVISION 6 OF THE CALIFORNIA CODE OF REGULATIONS**

Probable Cause Regulations

§ 18361 (b). Delegation by the Executive Director Pertaining to Enforcement Proceedings and Authority to Hear Probable Cause Proceedings.

Probable cause proceedings under Regulation 18361.4 shall be heard by the General Counsel or an attorney from the Legal Division. The General Counsel may delegate the authority to hear probable cause proceedings, in writing, to an administrative law judge.

§ 18361.4. Probable Cause Proceedings

(a) Probable Cause Report. If the Chief of the Enforcement Division decides to commence probable cause proceedings pursuant to Sections 83115.5 and 83116, he or she shall direct the Enforcement Division staff to prepare a written report, hereafter referred to as "the probable cause report." The probable cause report shall contain a summary of the law and evidence gathered in connection with the investigation, including any exculpatory and mitigating information of which the staff has knowledge and any other relevant material and arguments. The evidence recited in the probable cause report may include hearsay, including declarations of investigators or others relating the statements of witnesses or concerning the examination of physical evidence.

(b) No probable cause hearing will take place until at least 21 calendar days after the Enforcement Division staff provides the following, by service of process or registered or certified mail with return receipt requested, to all proposed respondents:

- (1) A copy of the probable cause report;
- (2) Notification that the proposed respondents have the right to respond in writing to the probable cause report and to request a probable cause conference at which the proposed respondent may be present in person and represented by counsel, and;
- (3) If the Commission met in executive session on this matter pursuant to Regulation 18361.2, a copy of any staff memoranda submitted to the Commission at that time along with the recording of any discussion between the Commission and the staff at the executive session as required in subdivision (b) of Regulation 18361.2.

(c) Response to Probable Cause Report.

- (1) Each proposed respondent may submit a written response to the probable cause report. The response may contain a summary of evidence, legal arguments, and any mitigating or exculpatory information. A proposed respondent who submits a response must file it with the Commission Assistant who will forward the response to the General Counsel or an attorney in the Legal Division (the "hearing officer") and provide a copy, by service of process or registered or certified mail with return receipt requested, to all other proposed respondents listed in the probable cause report not later than 21 days following service of the probable cause report.
- (2) Within 21 calendar days following the service of the probable cause report, a proposed

respondent may request discovery of evidence in the possession of the Enforcement Division. This request must be sent by registered or certified mail to the Commission Assistant. Upon receipt of the request, the Enforcement Division shall provide discovery of evidence relied upon by the Enforcement Division sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation, along with any exculpatory or mitigating evidence. This is not a right to full discovery of the Enforcement Division file. The Enforcement Division shall provide access to documents for copying by the Respondent, or upon agreement among the parties, the Enforcement Division will provide copies of the requested documents upon payment of a fee for direct costs of duplication. The Enforcement Division shall provide such evidence by service of process or registered or certified mail with return receipt requested to all respondents, with a copy to the Commission Assistant. A respondent may submit a written response to the probable cause report described in subsection (1) no later than 21 calendar days after service of discovery.

- (3) The Commission staff may submit any evidence or argument in rebuttal to the response. When the Commission staff submits evidence or argument in rebuttal to the response, it shall provide a copy, by service of process or registered or certified mail with return receipt requested, to all proposed respondents listed in the probable cause report not later than 10 calendar days following the date the response was filed with the Commission Assistant. The hearing officer may extend the time limitations in this section for good cause. At any time prior to a determination of probable cause, the hearing officer may allow additional material to be submitted as part of the initial response or rebuttal.

(d) Probable Cause Conference. Any proposed respondent may request a probable cause conference. The request shall be served upon the Commission Assistant and all other proposed respondents not later than 21 days after service of the probable cause report unless the hearing officer extends the time for good cause. The Commission Assistant shall fix a time for the probable cause conference and the hearing officer shall conduct the conference informally. The conference shall be closed to the public unless a proposed respondent requests and all other proposed respondents agree to a public conference. If the conference is not public, only members of the Commission staff, any proposed respondent and his or her legal counsel or representative shall have the right to be present and participate. The hearing officer may allow witnesses to attend and participate in part or all of the probable cause conference. In making this determination, the hearing officer shall consider the relevancy of the witness' proposed testimony, whether the witness has a substantial interest in the proceedings, and whether fairness requires that the witness be allowed to participate. Representatives of any civil or criminal prosecutor with jurisdiction may attend the conference at the discretion of the hearing officer if they agree to respect the confidential nature of the proceedings. If the conference is not open to the public and none of the parties and the presiding officer object, the conference may be conducted in whole or in part by telephone. The probable cause conference shall be recorded. The hearing officer may determine whether there is probable cause based solely on the probable cause report, any responses or rebuttals filed and any arguments presented at the probable cause conference by the interested parties. If the hearing officer requires additional information before determining whether there is probable cause, he or she may permit any party to submit additional evidence at the probable cause conference.

(e) Finding of Probable Cause. The hearing officer may find there is probable cause to believe a violation has occurred if the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation. A finding of probable cause by the hearing officer does not constitute a finding that a violation has actually occurred. The hearing officer shall not make a finding of probable cause if he or she is presented with clear and convincing evidence that, at a time prior to the alleged violation, the violator consulted with the staff of the Commission in good faith, disclosed truthfully all the material facts, and committed the acts complained of either in reliance on the advice of the staff or because of the staff's failure to provide advice. If the hearing officer makes a finding of probable cause, the Enforcement Division shall prepare an Accusation pursuant to Section 11503 and have it served upon the person or persons who are subjects of the probable cause finding. The hearing officer shall publicly announce the finding of probable cause. The announcement shall contain a summary of the allegations and a cautionary statement that the respondent is presumed to be innocent of any violation of the Act unless a violation is proved in a subsequent proceeding. The Chief of the Enforcement Division shall be responsible for the presentation of the case in support of the Accusation at an administrative hearing held pursuant to Section 83116.

§ 18362. Access to Enforcement Records

(a) Production of Enforcement Records. The Commission will make complaints, investigative files, and related records available to the public and members of the media in accordance with the Public Records Act (Government Code Section 6250, et seq.) Enforcement records requests should specifically identify the documents sought.

(b) Format of Enforcement Records. The Commission will make records available for inspection at its office during office hours. The Commission may provide copies of requested records either in paper or electronic format to the person that requested the records in lieu of inspecting the records at the Commission offices. Any person requesting paper copies of records must reimburse the Commission ten cents (\$0.10) per page to pay the cost of copying, or supply copying equipment and make copies in the offices of the Commission. Original records of the Commission may not be removed from the offices of the Commission.

(c) Complaint Notice Period. The Commission may not provide or make available complaints or related records until after the disclosure periods provided in Regulation 18360.

§ 18361.2. Memorandum Respecting Civil Litigation.

(a) If the Executive Director concludes civil litigation should be initiated, he or she shall submit to the Commission a written memorandum, which shall be first reviewed by the General Counsel, or an attorney from the Legal Division, summarizing the facts and the applicable law of the case and recommending the initiation of a lawsuit. The memorandum shall include all exculpatory and mitigating information known to the staff.

(b) The Commission shall review the memorandum at an executive session. The General

Counsel, or an attorney from the Legal Division, and the Commission Assistant shall be in attendance. No other member of the staff may be present unless the Commission meets with a member of the staff for that person to answer questions. The Commission may not resume its deliberations until the person is no longer present. Any communication between the Commission and the person during the executive session shall be recorded. After review of the memorandum, the Commission may direct the Executive Director to do any of the following:

- (1) Initiate civil litigation.
- (2) Decide whether probable cause proceedings should be commenced pursuant to 2 Cal. Code of Regulations Section 18361.4.
- (3) Return the matter to the staff for further investigation.
- (4) Take no further action on the matter or take any other action it deems appropriate.

(c) If the Commission decides to initiate civil litigation, the Commission may then permit other members of the staff to attend the executive session.

(d) If the Executive Director deems it necessary, he or she may call a special meeting of the Commission to review a staff memorandum recommending the initiation of civil litigation.

(e) It is the intent of the Commission in adopting this section to preserve for the members of the Commission the authority to decide whether alleged violations should be adjudicated in administrative hearings or in civil litigation, while at the same time avoiding the possibility that discussions with members of the staff might cause members of the Commission to prejudge a case that might be heard by the Commission under Government Code Section 83116.

Exhibit A-7

GALENA WEST
Chief of Enforcement
MICHAEL W. HAMILTON
Commission Counsel
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street, Suite 3000
Sacramento, CA 95811
Telephone: (916) 322-5772
Email: mhamilton@fppc.ca.gov

Attorneys for Complainant

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

In the Matter of) FPPC No. 15/245
)
CORSO FOR CITY COUNCIL 2014,) EX PARTE REQUEST FOR A FINDING OF
TAXPAYERS FOR OCEANSIDE) PROBABLE CAUSE AND AN ORDER THAT
NEIGHBORHOODS, AND DANA CORSO,) AN ACCUSATION BE PREPARED AND
) SERVED
)
) Gov. Code § 83115.5
)
Respondents.)

TO THE HEARING OFFICER OF THE FAIR POLITICAL PRACTICES COMMISSION:

Pursuant to Section 83115.5 of the Political Reform Act (the "Act")¹ and Regulation 18361.4, Respondents Corso for Council 2014 ("Corso for Council"), Taxpayers for Oceanside Neighborhoods ("Taxpayers for Oceanside"), and Dana Corso ("Corso") were served with a copy of a report in support of a finding of probable cause ("Report") in the above-entitled matter.² The Report, attached as "Exhibit A," was part of a packet of materials, including a cover letter and a memorandum describing probable cause proceedings that were sub-served on Corso, Corso for Council, and Taxpayers for Oceanside on November 30, 2018 by leaving the documents at Village Property Management (Corso's place of business) with the receptionist who is authorized to accept service after reasonable attempts were made to serve Corso at her home. A copy of the documents was mailed by First Class on December 1, 2018 to the

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

² Gov. Code § 83115.5; Cal. Code Reg., tit. 2, § 18361.4.

1 place where the copies were left – making substituted service effective on December 11, 2018. A copy of
2 the proofs of service and service attempts are attached as “Exhibit B.”

3 On February 26, 2019, an Amended Report in Support of Probable Cause was mailed to Corso via
4 certified mail at Village Property Management.³ On March 4, 2019, the certified mail receipt was returned
5 to the Enforcement Division and dated February 28 – making service effective March 20, 2019. A copy
6 of the report, the proof, and certified mail receipt are attached as “Exhibit C.”

7 In the cover letter dated February 26, 2019, and the attached materials, Corso was advised that she
8 could respond in writing to the Report and orally present the case to the Hearing Officer at a probable
9 cause conference to be held in Sacramento. Corso was further advised that in order to have a probable
10 cause conference she needed to make a written request for one on or before 21 days of the date they
11 received the Report. Additionally, Corso was advised that if she did not request a probable cause
12 conference, such a conference would not be held and probable cause would be determined based solely
13 on the Report and any written response that they submitted within 21 days of the date they were served
14 with the Report. To date, Corso has not submitted a written response or requested a probable cause
15 conference.

16 WHEREFORE, based on the attached Report, the Enforcement Division requests a finding by the
17 Hearing Officer that probable cause exists to believe that Corso, Corso for Council, and Taxpayers for
18 Oceanside committed violations of the Act, stated as follows:

19 Count 1: Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a
20 \$1,000 in-kind contribution from Oceanside Associates received during the preelection
21 reporting period covering July 1, 2014 – September 30, 2014, due by October 6, 2014, in
violation of Government Code Section 84211, subdivisions (a), (c), and (f).

22 Count 2: Corso for Council and Corso failed timely file a preelection statement covering the
23 reporting period of October 1, 2014 – October 18, 2014, due by October 23, 2014, in
24 violation of Government Code Sections 84200.5, subdivision (b) and 84200.7, subdivision,
(b).

25 ///

26 _____
27 ³ The probable cause report was amended to change the subdivisions from (a) to (b) in count 2 and subdivision (b)
was added to Section 84200.7 in counts 11 & 12. Additionally, in law section pertaining to the liability, the treasurer was
included on line 15.

1 Count 3: Corso for Council and Corso failed timely file a semi-annual campaign statement covering
2 the reporting period of October 19, 2014 – December 31, 2014, due by February 2, 2015,
3 in violation of Government Code Section 84200.

4 Count 4: Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000
5 in-kind contribution in the form of office space from Oceanside Associates on September
6 30, 2014, in violation of Government Code Sections 84203 and 84203.3, subdivision (b).

7 Count 5: Corso for Council and Corso failed to timely file a 24-hour report after receiving
8 contributions from Bernard Blom that aggregated to \$1,000 on October 1, 2014, in
9 violation of Government Code Section 84203.

10 Count 6: Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000
11 in-kind contribution in the form of office space from Oceanside Associates on October 31,
12 2014, in violation of Government Code Section 84203 and 84203.3, subdivision (b).

13 Count 7: Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
14 covering the reporting period of July 1, 2013 – December 31, 2013, due by January 31,
15 2014, in violation of Government Code Section 84200.

16 Count 8: Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
17 covering the reporting period of January 1, 2014 – June 30, 2014, due by July 31, 2014, in
18 violation of Government Code Section 84200.

19 Count 9: Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
20 covering the reporting period of July 1, 2014 – December 31, 2014, in violation of
21 Government Code Section 84200.

22 Count 10: Taxpayers for Oceanside and Corso failed to amend its statement of organization to include
23 Corso's last name in the name of the committee on or around August 17, 2014, in violation
24 of Government Code Section 84103 and Regulation 18402, subdivision (c)(1) and (2).

25 Count 11: Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering
26 the reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014, in violation
27 of Government Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

28 Count 12: Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering
the reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014, in
violation of Government Code Sections 84200.5 subdivision (b) and 84200.7, subdivision
(b).

Additionally, after finding probable cause exists, the Enforcement Division requests an order by
the Hearing Officer that an accusation be prepared against Corso, Corso for Council, and Taxpayers for
Oceanside and served upon them.⁴

///

⁴ Gov. Code § 11503.

1 A copy of this Request was mailed via U.S. Mail to Corso on April 10, 2019 at her last known
2 address, as follows:

3
4 Dana Corso
5 5256 South Mission Rd, Suite 310
6 Bonsall, CA 92003

7 Dated: 4/10/19

8 Respectfully Submitted,

9 **FAIR POLITICAL PRACTICES COMMISSION**

10 Galena West
11 Chief of Enforcement

12 
13 By: Michael W. Hamilton
14 Commission Counsel
15 Enforcement Division

EXHIBIT A

1 GALENA WEST
Chief of Enforcement
2 MICHAEL W. HAMILTON
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 322-5772
5 Email: mhamilton@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission
7

8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

9 **STATE OF CALIFORNIA**

10
11 In the Matter of

) FPPC No. 15/245

12)
13)
14) **CORSO FOR CITY COUNCIL 2014,**
TAXPAYERS FOR OCEANSIDE
NEIGHBORHOODS, AND DANA
15 **CORSO,**

) **REPORT IN SUPPORT OF A FINDING OF**
16 **PROBABLE CAUSE**

) Conference Date: TBA
17) Conference Time: TBA
18) Conference Location: Commission Offices
1102 Q Street, Suite 3000
19 Sacramento, CA 95811

20 Respondents.

21 **INTRODUCTION**

22 Respondent Dana Corso ("Corso") was an unsuccessful candidate for the Oceanside City Council
23 in 2014. Respondent Corso for Council 2014 ("Corso for Council") is Corso's controlled committee.
24 Respondent Taxpayers for Occanside Neighborhoods ("Taxpayers for Oceanside") is a city general
25 purpose committee. Corso serves as treasurer of both Corso for Council and Taxpayers for Oceanside.
26
27

1 The Political Reform Act (the "Act")¹ requires committees and candidates to do the following: timely file
2 semi-annual campaign statements by July 31 and January 31 of each year, timely file prelection
3 statements, timely report the receipt of contributions on all campaign statements, and it requires 24-hour
4 reports to be filed within 24-hours of receiving or making a late contribution in the 90 days leading up to
5 an election. Furthermore, the Act prohibits a candidate from making expenditures out of any bank account
6 other than the one designed for campaign activity on their statement of organization.

7 Corso for Council and Corso violated the Act by failing to timely report the receipt of
8 contributions, failing to timely file a preelection statement, failing to timely file a semi-annual statement,
9 and by failing to timely file 24-hour reports.

10 Taxpayers for Oceanside and Corso violated the Act by failing to timely file four semi-annual
11 campaign statements, failing to timely file an amendment to its statement of organization, and failing to
12 timely file two preelection campaign statements.

13 SUMMARY OF THE LAW

14 All legal references and discussions of law pertain to the Act's provisions as they existed at the
15 time of the violations.

16 Jurisdiction

17 The Fair Political Practices Commission (the "Commission") has administrative jurisdiction to
18 enforce the provisions of the Act.²

19 Probable Cause Proceedings

20 Prior to the Enforcement Division commencing an administrative action, the General Counsel of
21 the Commission or her designee (the "hearing officer"), must make a finding that there is probable cause
22 to believe the respondent has violated the Act.³ After a finding of probable cause, the Commission may
23

24
25 ¹ The Political Reform Act is contained in Government 81000 through 91014. The regulations of the Fair Political
Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

26 ² Section § 83116.

27 ³ Section 83115.5, and Reg. 18361 and 18361.4.

1 hold a noticed hearing in accordance with the Administrative Procedure Act⁴ to determine whether
2 violations occurred, and levy an administrative penalty of up to \$5,000 for each violation.⁵

3 Standard for Finding Probable Cause

4 To make a finding of probable cause, the hearing officer must be presented with sufficient
5 evidence to lead a person of ordinary caution and prudence to believe, or entertain a strong suspicion,
6 that a respondent committed or caused a violation.⁶

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

8 When enacting the Political Reform Act, the people of the state of California found and declared
9 that previous laws regulating political practices suffered from inadequate enforcement by state and local
10 authorities.⁷ To that end, the Act must be liberally construed to achieve its purposes.⁸

11 Controlled Committee

12 Under the Act, a controlled committee is defined as a "...committee that is controlled directly or
13 indirectly by a candidate or state measure proponent or that has acted jointly with a candidate, controlled
14 committee, or state measure proponent in connection with the making of expenditures. A candidate or
15 state measure proponent controls a committee if he or she, his or her agent, or any other committee he or
16 she controls has a significant influence on the actions or decisions of the committee."⁹ Under the Act,
17 there is not a definition of "significant influence", but the Commission has advised that a candidate is
18 presumed to exert significant influence "...whenever the candidate is a voting member of a committee's
19 leadership body..."¹⁰

20 ///

21 _____
⁴ Section 11500, et seq.

22 ⁵ Section 83116, and Reg. 18361.4, subdivision. (e).

23 ⁶ Reg. 18361.4, subdivision, (e).

24 ⁷ Section 81001, subdivision (h).

25 ⁸ Section 81003.

26 ⁹ Section 82016, subdivision (a).

27 ¹⁰ *Ferguson* Advice Letter, No. A-86-044. FPPC advice letters are issued pursuant to Government Code section 83114,
28 subdivision (b), and California Code of Regulations, title 2, section 18329. They offer guidance to the public, and under certain
circumstances, the requestor may use the advice as a defense in an enforcement proceeding. Although the ultimate resolution
of legal issues regarding statutory interpretation lies with the courts, the advice of the FPPC as an agency empowered by the
Legislature to interpret and enforce the Political Reform Act is entitled to weight.

1 Semi-Annual Campaign Statements

2 The Act requires candidates and committees to file semi-annual statements each year "...no later
3 than July 31 for the period ending June 30, and no later than January 31, for the period ending December
4 31..."¹¹ However, if the due date falls on a Saturday, Sunday, or official state holiday, "the filing deadline
5 for such a statement or report shall be extended to the next regular business day."¹²

6 Preelection Campaign Statement

7 The Act states that "All candidates appearing on the ballot to be voted on at the next election, their
8 controlled committees, and committees primarily formed to support or oppose an elected officer,
9 candidate, or measure appearing on the ballot to be voted on at the next election shall file the applicable
10 preelection statements."¹³ A candidate and their controlled committee are required to file a preelection
11 statement on October 5 for the period ending September 30 and for the period ending 17 days before an
12 election the statement shall be filed no later than 12 days before the election.¹⁴

13 Contents of a Campaign Statement

14 The Act requires each campaign statement to contain information pertaining to the total amount of
15 contributions received during the applicable period, the total amount of expenditures made during the
16 applicable period, and the name, street address, occupation, and employer of any contributor that has made
17 contributions totaling more than \$100 in the applicable period.¹⁵

18 Statement of Organization Amendments

19 The Act requires committees to file an amendment statement of organization within ten days to
20 reflect any changes.¹⁶

21 ///

22 ///

23 _____
24 ¹¹ Section 84200, subdivision (a).

25 ¹² Regulation 18116, subdivision (a).

26 ¹³ Section 84200.5, subdivision (b)

27 ¹⁴ Section 84200.7, subdivision (b)(1) and (2).

28 ¹⁵ Section 84211, subdivisions (a), (b), and (f).

¹⁶ Section 84103.

1 Naming a Controlled Committee

2 The Act requires the name of a candidate controlled committee to include the last name of the
3 controlling candidate, the office sought, and the year of the election.¹⁷

4 24-Hour Reports

5 Under the Act, a late contribution is defined as “A contribution, including a loan, that totals in the
6 aggregate one thousand dollars (\$1,000) or more and is made to or received by a candidate, a controlled
7 committee, or a committee formed or existing primarily to support or oppose a candidate or measure
8 within 90 days before the date of the election...”¹⁸ A candidate or committee that receives or makes a late
9 monetary contribution is required to report within 24-hours the receipt or making of a late contribution.¹⁹
10 Additionally, a candidate or committee that makes or receives a late in-kind contribution shall report that
11 activity within 48 hours of making or receiving a late in-kind contribution.²⁰

12 Candidate and Treasurer Liability

13 Under the Act, it is the duty of the candidate and treasurer of a controlled committee to ensure that
14 the committee complies with all the requirements of the Act concerning the receipt, expenditure, and
15 reporting of funds.²¹ The candidate may be held jointly and severally liable, along with the committee, for
16 violations committed by the committee.²²

17 Liability for Violations

18 Under the Act, “Any person who violates any provision of this title, who purposely or negligently
19 causes any other person to violate any provision of this title, or who aids and abets any other person in the
20 violation of this title shall be liable... This section shall only apply to persons who have filing or reporting
21
22

23
24 ¹⁷ Regulation 18402, subdivision (c)(1) and (2).

¹⁸ Section 82036, subdivision (a).

25 ¹⁹ Section 84203, subdivision (a) and (b).

26 ²⁰ Section 84203.3, subdivision (b).

²¹ Sections 81004, 84100 84213, and Regulation 18427.

²² Sections 83116.5 and 91006.

1 obligations under this title, or who are compensated for services involving the planning, organizing, or
2 directing any activity regulated or required by this title...”²³

3 SUMMARY OF THE EVIDENCE

4 On November 4, 2014, Corso was an unsuccessful candidate in the County of San Diego’s
5 General Election for Oceanside City Council. Corso for Council qualified as a committee on or around
6 August 17, 2014. Corso for Council received approximately \$26,388 in contributions and made
7 approximately \$25,194 in expenditures. At the time Corso was running for city council, Corso was also
8 serving as the treasurer of Taxpayers for Oceanside, which is a role she began on or around March 18,
9 2013. This matter was opened based on an audit of Corso for Council conducted by the California
10 Franchise Tax Board (“FTB”) covering the period of January 1, 2014 – December 31, 2014 and based on
11 several complaints alleging Corso for Council and Taxpayers for Oceanside were not in compliance with
12 the filing requirements of the Act.

13 The FTB found and the Enforcement Division confirmed that Corso for Council violated the Act
14 by failing to timely report contributions, failing to timely file 24-hour reports, and accepting cash
15 contributions. Furthermore, the Enforcement Division determined that Corso was controlling Taxpayers
16 for Oceanside at the same time she was running for Oceanside City Council. Taxpayers for Oceanside
17 violated the Act by failing to timely file four semi-annual campaign statements, failing to timely file an
18 amended statement of organization to change the name of the committee, and failing to timely file two
19 preelection campaign statements

20 Corso for City Council Reporting and Filing

21 During Corso’s 2014 campaign for Oceanside City Council, Corso for Council committed the
22 following reporting and filing violations:

23 ///

24 ///

25 ///

26 ²³ Section 83116.5.

Failure to Timely Report

Statement	Reporting Period	Monetary contributions	In-Kind contributions	Due Date	Date of Filing	Date of Amendment Reporting Contribution
Preelection (failure to timely report)	July 1, 2014 – September 30, 2014	A \$200 Contribution from Corso was not timely reported	A \$1,000 in-kind contribution from Oceanside Associates was not timely reported	October 6, 2014	October 6, 2014	July 15, 2015, Corso amended to include in-kind contribution but she reported the office space as valued at \$1,000 for 6 months instead of \$1,000 for the reporting period, which would have been accurate.

Failure to Timely File Preelection and Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Aggravating Factors:
Preelection	October 1, 2014 – October 18, 2014	October 23, 2014	October 27, 2014	<p>In aggravation, a \$581 in-kind contribution from Oceanside Associates was not reported on the preelection statement when it was filed. Instead it was reported on an amendment to the semi-annual statement ending December 31, 2014.²⁴</p> <p>In aggravation, Corso for Council used the reporting period of Oct 1, 2014 – October 22, 2014, instead of the correct reporting period, which was October 1, 2014 – October 18, 2014.</p>

²⁴ The in-kind contribution totals the amount incurred during the period. For example, the total for the month was \$1,000, but amount incurred during the period was \$581.

1 2 3 4 5 6	Semi-Annual (Failure to timely file)	October 19, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	In aggravation, once Corso filed she over-reported the loans she made to the campaign by \$2,010. FTB determined Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no transactions that matched Corso's reported amount. In aggravation, a \$919 in-kind contribution from Oceanside Associates was not timely reported
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Late Contribution Reports

Date Received	Contributor	Amount	Date Filed
September 30, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed
October 1, 2014	Bernard Blom	\$1,000 in total monetary contributions	Not filed
October 31, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed

Taxpayers for Oceanside

Taxpayers for Oceanside failed to timely file the following statements:

Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Activity ²⁵
Semi-Annual	July 1 2013 – December 31, 2013	January 31, 2014	March 27, 2014	Contrib: \$321 Expend: \$541
Semi-Annual	January 1, 2014 – June 30, 2014	July 31, 2014	October 27, 2014	Contrib: \$491 Expend: \$467
Semi-Annual	July 1, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Contrib: \$1,176 Expend: \$760

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²⁵ Amounts are based on filed campaign statements.

1 Corso's Control of Taxpayers for Oceanside

2 In addition to controlling Corso for Council, Corso also controlled Taxpayers for Oceanside.
3 According to the Act, a candidate controls a committee if he or she, his or her agent, or any other
4 committee he or she controls has a significant influence on the actions or decisions of the committee. The
5 Act does not define "significant influence", but the Commission has advised that a candidate is presumed
6 to exert significant influence "...whenever the candidate is a voting member of a committee's leadership
7 body..." In an interview with Program Specialist Bob Perna ("Perna") of the Fair Political Practices
8 Commission, Corso testified that she has served as treasurer and president of Taxpayers for Oceanside
9 since January of 2013 and is a voting member of the five-person board.²⁶ Based on the Act's definition of
10 a controlled committee, Corso's ability to exert significance influence over the decisions of Taxpayers for
11 Oceanside means that she controlled Taxpayers for Oceanside.

12 As a result of Corso controlling Taxpayers for Oceanside – Taxpayers for Oceanside was required
13 to change the committee's name on the statement of organization to include the controlling candidate's
14 last name, the office being sought, and the year of the election. Taxpayers for Oceanside was also required
15 to file preelection statements because it was being controlled by Corso. Therefore, Taxpayers for
16 Oceanside violated the Act by failing to amend its statement of organization to include Corso's last name
17 and by failing to file preelection statements covering the reporting periods of July 1, 2014 – September
18 30, 2014 and October 1, 2014 – October 18, 2014.

19 **VIOLATIONS**

20 Count 1: Failure to Timely Report

21 Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a \$1,000
22 in-kind contribution from Oceanside Associates received during the preelection reporting period covering
23 July 1, 2014 – September 30, 2014, due by October 6, 2014, in violation of Government Code Section
24 84211, subdivisions (a), (c), and (f).

25
26 ²⁶ Corso's statement regarding her position is supported by a statement of organization she signed, which lists Corso
27 as the treasurer and principal officer (president) of Taxpayers for Oceanside.

1 Count 2: Failure to Timely Report

2 Corso for Council and Corso failed timely file a preelection statement covering the reporting
3 period of October 1, 2014 – October 18, 2014, due by October 23, 2014, in violation of Government Code
4 Sections 84200.5, subdivision (a) and 84200.7, subdivision, (a).

5 Count 3: Failure to Timely Report

6 Corso for Council and Corso failed timely file a semi-annual campaign statement covering the
7 reporting period of October 19, 2014 – December 31, 2014, due by February 2, 2015, in violation of
8 Government Code Section 84200.

9 Count 4: Failure to Timely File

10 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
11 contribution in the form of office space from Oceanside Associates on September 30, 2014, in violation
12 of Government Code Sections 84203 and 84203.3, subdivision (b).

13 Count 5: Failure to Timely File

14 Corso for Council and Corso failed to timely file a 24-hour report after receiving contributions
15 from Bernard Blom that aggregated to \$1,000 on October 1, 2014, in violation of Government Code
16 Section 84203.

17 Count 6: Failure to Timely File

18 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
19 contribution in the form of office space from Oceanside Associates on October 31, 2014, in violation of
20 Government Code Section 84203 and 84203.3, subdivision (b).

21 Count 7: Failure to Timely File

22 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
23 covering the reporting period of July 1, 2013 – December 31, 2013, due by January 31, 2014, in violation
24 of Government Code Section 84200.

25 ///

1 Count 8: Failure to Timely File

2 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
3 covering the reporting period of January 1, 2014 – June 30, 2014, due by July 31, 2014, in violation of
4 Government Code Section 84200.

5 Count 9: Failure to Timely File

6 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
7 covering the reporting period of July 1, 2014 – December 31, 2014, in violation of Government Code
8 Section 84200.

9 Count 10: Failure to Amend Statement of Organization

10 Taxpayers for Oceanside and Corso failed to amend its statement of organization to include
11 Corso's last name in the name of the committee on or around August 17, 2014, in violation of Government
12 Code Section 84103 and Regulation 18402, subdivision (c)(1) and (2).

13 Count 11: Failure to Timely File a Preelection Statement

14 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
15 reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014, in violation of Government
16 Code Sections 84200.5 subdivision (b) and 84200.7.

17 Count 12: Failure to Timely File a Preelection Statement

18 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
19 reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014, in violation of Government
20 Code Sections 84200.5 subdivision (b) and 84200.7.

21 **EXCULPATORY AND MITIGATING INFORMATION**

22 In mitigation, Corso for Council, Taxpayers for Oceanside, and Corso have never been penalized
23 for violating the Act.

24 In mitigation, Corso for Council timely filed 24-hour reports for three other contributions totaling
25 \$8,000.

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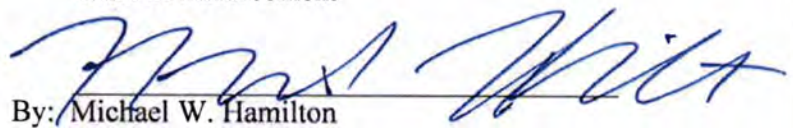
CONCLUSION

Probable cause exists to believe Corso for Council and Corso committed six violations of the Act as set forth above in Counts 1 – 6. Probable Cause exists to believe that Taxpayers for Oceanside and Corso committed six violations of the Act as set forth above in Counts 7 – 12. The Enforcement Division respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.

Dated: 9/4/18

Respectfully Submitted,

FAIR POLITICAL PRACTICES COMMISSION
Galena West
Chief of Enforcement



By: Michael W. Hamilton
Commission Counsel
Enforcement Division

EXHIBIT B

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Sacramento, California 95811. On 11/21/18, I served the following document(s):

1. Letter dated September 4, 2018, from Michael W. Hamilton;
2. FPPC No. 15/245 Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission; and
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.


By personal service. At 9:04 (a.m.)/p.m.:

I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.


By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

I am a resident or employed in the county where the mailing occurred. The documents were emailed in Sacramento County, California.

SERVICE LIST

Dana Corso
Individually, and o/b/o
Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods


I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 4/10/19.



Suzanna Gevorkyan

Affidavit of Process Server

FAIR POLITICAL PRACTICES COMMISSION

(NAME OF COURT)

IN THE MATTER OF
PLAINTIFF/PETITIONER

CORSO FOR CITY COUNCIL
DEFENDANT/RESPONDENT

15/245
CASE NUMBER

I, MANFRED ARNOLD BRIESE JR., being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said service.

Service: I served NON-SERVICE - DANA CORSO
NAME OF PERSON / ENTITY BEING SERVED

with (list documents) LETTER; REPORT IN SUPPORT OF FINDING OF PROBABLE CAUSE

by leaving with _____ At _____

Residence

NAME	RELATIONSHIP
██████████	██████████
ADDRESS	CITY / STATE

Business

ADDRESS	CITY / STATE
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On _____ AT _____
DATE TIME

Inquired if subject was a member of the U.S. Military and was informed they are not.

Thereafter copies of the documents were mailed by prepaid, first class mail on _____ DATE

from _____
CITY STATE ZIP

Manner of Service:

- Personal:** By personally delivering copies to the person being served.
- Substituted at Residence:** By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household over the age of _____ and explaining the general nature of the papers.
- Substituted at Business:** By leaving, during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof.
- Posting:** By posting copies in a conspicuous manner to the front door of the person/entity being served.

Non-Service: After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

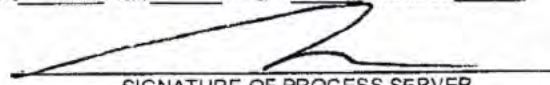
- Unknown at Address
- Moved, Left no Forwarding
- Service Cancelled by Litigant
- Unable to Serve in Timely Fashion
- Address Does Not Exist
- Other ***SEE ATTACHED DECLARATION

Service Attempts: Service was attempted on: (1) _____ (2) _____
DATE TIME DATE TIME

(3) _____ (4) _____ (5) _____
DATE TIME DATE TIME DATE TIME

Description: Age _____ Sex _____ Race _____ Height _____ Weight _____ Hair _____ Beard _____ Glasses _____

I DECLARE UNDER PENALTY OF PERJURY THE FOREGOING IS TRUE AND CORRECT.


SIGNATURE OF PROCESS SERVER
Manfred Arnold Briese, Jr.

**SAN DIEGO SERVICE OF PROCESS
2445 MORENA BLVD. STE. 201
SAN DIEGO, CA 92110**

PLAINTIFF/PETITIONER: IN THE MATTER OF DEFENDANT/RESPONDENT: CORSO FOR CITY COUNCIL	CASE NUMBER: 15/245
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DECLARATION

(This form must be attached to another form or court paper before it can be filed in court.)

I, MANFRED ARNOLD BRIESE JR., am a registered process server and am employed in the county of San Diego. I am aware of the facts presented below. After due and diligent effort, I have been unable to effect personal service on the below- named subject. A list of dates, times and attempts at service is as follows:

SERVEE: DANA CORSO

ADDRESS: [REDACTED]

SERVICE ATTEMPTS AND RESULTS:

11/21/2018 at 7:33pm - No response at door. House dark. Large dog barking inside. Left contact card on door.

11/23/2018 at 6:41pm - No response at door. House dark. White Ford truck in driveway. Different shoes on porch from last attempt.

11/24/2018 at 8:46am - No response at door. Truck gone. Card was ripped up and left where I left it.

11/26/2018 at 7:30pm - No response at door. No movement. Heard dog inside.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 11/29/2018

MANFRED ARNOLD BRIESE JR.
(TYPE OR PRINT NAME)


(SIGNATURE OF DECLARANT)

- Attorney for
- Plaintiff
- Petitioner
- Defendant
- Respondent
- Other (Specify):
SAN DIEGO CO. #3261

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number (if applicable), and address)

FOR COURT USE ONLY

Fair Political Practices Commission
1102 Q Street, Suite 3000

Sacramento CA 95811

Telephone Number: 916-322-5772

ATTORNEY FOR (Name) Plaintiff

Insert name of Court, and Judicial District and Branch Court:
Before The Fair Political Practices Commission State Of California

PLAINTIFF: Fair Political Practices Commission

DEFENDANT: Dana Corso, et al

PROOF OF SERVICE

Case Number:

1. At the time of service I was at least 18 years of age and not a party to this action:

2. I served the following document(s) Letter To Plaintiff, Report In Support Of A Finding of Probable Cause, Probable Cause Fact Sheet, Probable Cause Statutes, and Probable Cause Regulations

3. a. Party served: Dana Corso

b. Person served: party in item 3.a. Elizebeth Doe, Receptionist authorized to accept service

4. Address where the party was served: Village Property Management Inc, 5256 S MISSION RD STE 310, BONSALL, CA 92003

5. I served the party by: Substitute Service

I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on: (date): 11/30/2018 (2) at (time): 2:50:00 PM

I thereafter mailed by First Class, (postage prepaid) copies of the documents to the person served at the place where the copies were left (Code Civil Procedure 415.20. I mailed the documents on: 12-1-18

6. The notice to the person served (on the summons) was completed as follows: a.

7. Person who served papers: a. (name): Jorge Varela

b. American Process Service
5491 Shattuck Ave
Fremont, CA 94555

c. phone: 510-383-6173

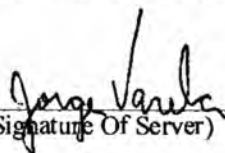
d. The fee for service was: \$ 50.00

e. I am a registered California process server
f. Registration #: 1203 County of Alameda

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Date: 11/30/2018

Jorge Varela
(Print Name)


(Signature Of Server)

PROOF OF SERVICE

2018 DEC -7 PM 2:21

EXHIBIT C

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, California 95811. On February 26, 2019, I served the following document(s):

1. Letter dated February 26, 2019, from Michael W. Hamilton;
2. FPPC No. 15/245 Amended Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission; and
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By United States Postal Service. I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the addresses listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Certified Mail, Return Receipt Requested

Dana Corso
Individually, and o/b/o
Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods
5256 South Mission Rd, Suite 310
Bonsall, CA 92003

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on February 26, 2019.

Lominiles Wojewoda

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

<p>Certified Mail Fee \$ _____</p> <p>Extra Services & Fees (check box, add fee as appropriate)</p> <p><input type="checkbox"/> Return Receipt (hardcopy) \$ _____</p> <p><input type="checkbox"/> Return Receipt (electronic) \$ _____</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery \$ _____</p> <p><input type="checkbox"/> Adult Signature Required \$ _____</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery \$ _____</p> <p>Postage \$ _____</p> <p>Total Postage and Fees \$ _____</p> <p>Sent To <u>Dana Corso</u> Street and Apt. No., or PO Box No. <u>5256 South Mission Road, Suite 310</u> City, State, ZIP+4® <u>Bonsall, CA 92003</u></p>	<p>Postmark Here</p>
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PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece. <p>Dana Corso individually, and o/b/o Corso for City Council 2014 Taxpayers for Oceanside Neighborhoods 5256 South Mission Road, Suite 310 Bonsall, CA 92003</p> <p style="text-align: center;">9590 9402 4215 8121 8981 37</p> <p>2. Article Number (Transfer from service label) 7018 0040 0000 7989 8252</p>	<p>A. Signature <input checked="" type="checkbox"/> <u>D. Corso</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____ C. Date of Delivery <u>7/28</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input checked="" type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Registered Mail Restricted Delivery (or \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Registered Mail Restricted Delivery (or \$500)	
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<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Registered Mail Restricted Delivery (or \$500)																	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

1 The Political Reform Act (the "Act")¹ requires committees and candidates to do the following: timely file
2 semi-annual campaign statements by July 31 and January 31 of each year, timely file prelection
3 statements, timely report the receipt of contributions on all campaign statements, and it requires 24-hour
4 reports to be filed within 24-hours of receiving or making a late contribution in the 90 days leading up to
5 an election. Furthermore, the Act prohibits a candidate from making expenditures out of any bank account
6 other than the one designed for campaign activity on their statement of organization.

7 Corso for Council and Corso violated the Act by failing to timely report the receipt of
8 contributions, failing to timely file a prelection statement, failing to timely file a semi-annual statement,
9 and by failing to timely file 24-hour reports.

10 Taxpayers for Oceanside and Corso violated the Act by failing to timely file four semi-annual
11 campaign statements, failing to timely file an amendment to its statement of organization, and failing to
12 timely file two prelection campaign statements.

13 This probable cause report is being amended to change the subdivisions from (a) to (b) in count 2
14 and subdivision (b) was added to Section 84200.7 in counts 11 and 12. Additionally, in law section
15 pertaining to the liability, the treasurer was included on line 15.

16 SUMMARY OF THE LAW

17 All legal references and discussions of law pertain to the Act's provisions as they existed at the
18 time of the violations.

19 Jurisdiction

20 The Fair Political Practices Commission (the "Commission") has administrative jurisdiction to
21 enforce the provisions of the Act.²

22 Probable Cause Proceedings

23 Prior to the Enforcement Division commencing an administrative action, the General Counsel of
24 the Commission or her designee (the "hearing officer"), must make a finding that there is probable cause

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

27 ² Section § 83116.

1 to believe the respondent has violated the Act.³ After a finding of probable cause, the Commission may
2 hold a noticed hearing in accordance with the Administrative Procedure Act⁴ to determine whether
3 violations occurred, and levy an administrative penalty of up to \$5,000 for each violation.⁵

4 Standard for Finding Probable Cause

5 To make a finding of probable cause, the hearing officer must be presented with sufficient
6 evidence to lead a person of ordinary caution and prudence to believe, or entertain a strong suspicion,
7 that a respondent committed or caused a violation.⁶

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

9 When enacting the Political Reform Act, the people of the state of California found and declared
10 that previous laws regulating political practices suffered from inadequate enforcement by state and local
11 authorities.⁷ To that end, the Act must be liberally construed to achieve its purposes.⁸

12 Controlled Committee

13 Under the Act, a controlled committee is defined as a "...committee that is controlled directly or
14 indirectly by a candidate or state measure proponent or that has acted jointly with a candidate, controlled
15 committee, or state measure proponent in connection with the making of expenditures. A candidate or
16 state measure proponent controls a committee if he or she, his or her agent, or any other committee he or
17 she controls has a significant influence on the actions or decisions of the committee."⁹ Under the Act,
18 there is not a definition of "significant influence", but the Commission has advised that a candidate is
19 presumed to exert significant influence "...whenever the candidate is a voting member of a committee's
20 leadership body..."¹⁰

22 ³ Section 83115.5, and Reg. 18361 and 18361.4.

23 ⁴ Section 11500, et seq.

24 ⁵ Section 83116, and Reg. 18361.4, subdivision. (e).

25 ⁶ Reg. 18361.4, subdivision, (e).

26 ⁷ Section 81001, subdivision (h).

27 ⁸ Section 81003.

28 ⁹ Section 82016, subdivision (a).

¹⁰ *Ferguson* Advice Letter, No. A-86-044. FPPC advice letters are issued pursuant to Government Code section 83114, subdivision (b), and California Code of Regulations, title 2, section 18329. They offer guidance to the public, and under certain circumstances, the requestor may use the advice as a defense in an enforcement proceeding. Although the ultimate resolution

1 Semi-Annual Campaign Statements

2 The Act requires candidates and committees to file semi-annual statements each year "...no later
3 than July 31 for the period ending June 30, and no later than January 31, for the period ending December
4 31..."¹¹ However, if the due date falls on a Saturday, Sunday, or official state holiday, "the filing deadline
5 for such a statement or report shall be extended to the next regular business day."¹²

6 Preelection Campaign Statement

7 The Act states that "All candidates appearing on the ballot to be voted on at the next election, their
8 controlled committees, and committees primarily formed to support or oppose an elected officer,
9 candidate, or measure appearing on the ballot to be voted on at the next election shall file the applicable
10 preelection statements."¹³ A candidate and their controlled committee are required to file a preelection
11 statement on October 5 for the period ending September 30 and for the period ending 17 days before an
12 election the statement shall be filed no later than 12 days before the election.¹⁴

13 Contents of a Campaign Statement

14 The Act requires each campaign statement to contain information pertaining to the total amount of
15 contributions received during the applicable period, the total amount of expenditures made during the
16 applicable period, and the name, street address, occupation, and employer of any contributor that has made
17 contributions totaling more than \$100 in the applicable period.¹⁵

18 Statement of Organization Amendments

19 The Act requires committees to file an amendment statement of organization within ten days to
20 reflect any changes.¹⁶

21 ///

22 _____
23 of legal issues regarding statutory interpretation lies with the courts, the advice of the FPPC as an agency empowered by the
24 Legislature to interpret and enforce the Political Reform Act is entitled to weight.

24 ¹¹ Section 84200, subdivision (a).

25 ¹² Regulation 18116, subdivision (a).

26 ¹³ Section 84200.5, subdivision (b)

27 ¹⁴ Section 84200.7, subdivision (b)(1) and (2).

28 ¹⁵ Section 84211, subdivisions (a), (b), and (f).

¹⁶ Section 84103.

1 Naming a Controlled Committee

2 The Act requires the name of a candidate controlled committee to include the last name of the
3 controlling candidate, the office sought, and the year of the election.¹⁷

4 24-Hour Reports

5 Under the Act, a late contribution is defined as “A contribution, including a loan, that totals in the
6 aggregate one thousand dollars (\$1,000) or more and is made to or received by a candidate, a controlled
7 committee, or a committee formed or existing primarily to support or oppose a candidate or measure
8 within 90 days before the date of the election...”¹⁸ A candidate or committee that receives or makes a late
9 monetary contribution is required to report within 24-hours the receipt or making of a late contribution.¹⁹
10 Additionally, a candidate or committee that makes or receives a late in-kind contribution shall report that
11 activity within 48 hours of making or receiving a late in-kind contribution.²⁰

12 Candidate and Treasurer Liability

13 Under the Act, it is the duty of the candidate and treasurer of a controlled committee to ensure that
14 the committee complies with all the requirements of the Act concerning the receipt, expenditure, and
15 reporting of funds.²¹ The candidate and treasurer may be held jointly and severally liable, along with the
16 committee, for violations committed by the committee.²²

17 Liability for Violations

18 Under the Act, “Any person who violates any provision of this title, who purposely or negligently
19 causes any other person to violate any provision of this title, or who aids and abets any other person in the
20 violation of this title shall be liable... This section shall only apply to persons who have filing or reporting
21
22

23
24 ¹⁷ Former Regulation 18402, subdivision (c)(1) and (2).

¹⁸ Former Section 82036, subdivision (a).

25 ¹⁹ Section 84203, subdivision (a) and (b).

²⁰ Section 84203.3, subdivision (b).

26 ²¹ Sections 81004, 84100 84213, and Regulation 18427.

²² Sections 83116.5 and 91006.

1 obligations under this title, or who are compensated for services involving the planning, organizing, or
2 directing any activity regulated or required by this title...”²³

3 **SUMMARY OF THE EVIDENCE**

4 On November 4, 2014, Corso was an unsuccessful candidate in the County of San Diego’s
5 General Election for Oceanside City Council. Corso for Council qualified as a committee on or around
6 August 17, 2014. Corso for Council received approximately \$26,388 in contributions and made
7 approximately \$25,194 in expenditures. At the time Corso was running for city council, Corso was also
8 serving as the treasurer of Taxpayers for Oceanside, which is a role she began on or around March 18,
9 2013. This matter was opened based on an audit of Corso for Council conducted by the California
10 Franchise Tax Board (“FTB”) covering the period of January 1, 2014 – December 31, 2014 and based on
11 several complaints alleging Corso for Council and Taxpayers for Oceanside were not in compliance with
12 the filing requirements of the Act.

13 The FTB found and the Enforcement Division confirmed that Corso for Council violated the Act
14 by failing to timely report contributions, failing to timely file 24-hour reports, and accepting cash
15 contributions. Furthermore, the Enforcement Division determined that Corso was controlling Taxpayers
16 for Oceanside at the same time she was running for Oceanside City Council. Taxpayers for Oceanside
17 violated the Act by failing to timely file four semi-annual campaign statements, failing to timely file an
18 amended statement of organization to change the name of the committee, and failing to timely file two
19 preelection campaign statements

20 Corso for City Council Reporting and Filing

21 During Corso’s 2014 campaign for Oceanside City Council, Corso for Council committed the
22 following reporting and filing violations:

23 ///

24 ///

25 ///

26 ²³ Section 83116.5.

Failure to Timely Report

Statement	Reporting Period	Monetary contributions	In-Kind contributions	Due Date	Date of Filing	Date of Amendment Reporting Contribution
Preelection (failure to timely report)	July 1, 2014 – September 30, 2014	A \$200 Contribution from Corso was not timely reported	A \$1,000 in-kind contribution from Oceanside Associates was not timely reported	October 6, 2014	October 6, 2014	July 15, 2015, Corso amended to include in-kind contribution but she reported the office space as valued at \$1,000 for 6 months instead of \$1,000 for the reporting period, which would have been accurate.

Failure to Timely File Preelection and Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Aggravating Factors:
Preelection	October 1, 2014 – October 18, 2014	October 23, 2014	October 27, 2014	<p>In aggravation, a \$581 in-kind contribution from Oceanside Associates was not reported on the preelection statement when it was filed. Instead it was reported on an amendment to the semi-annual statement ending December 31, 2014.²⁴</p> <p>In aggravation, Corso for Council used the reporting period of Oct 1, 2014 – October 22, 2014, instead of the correct reporting period, which was October 1, 2014 – October 18, 2014.</p>

²⁴ The in-kind contribution totals the amount incurred during the period. For example, the total for the month was \$1,000, but amount incurred during the period was \$581.

1 2 3 4 5 6	Semi-Annual (Failure to timely file)	October 19, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	In aggravation, once Corso filed she over-reported the loans she made to the campaign by \$2,010. FTB determined Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no transactions that matched Corso's reported amount. In aggravation, a \$919 in-kind contribution from Oceanside Associates was not timely reported
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Late Contribution Reports

Date Received	Contributor	Amount	Date Filed
September 30, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed
October 1, 2014	Bernard Blom	\$1,000 in total monetary contributions	Not filed
October 31, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed

Taxpayers for Oceanside

Taxpayers for Oceanside failed to timely file the following statements:

Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Activity ²⁵
Semi-Annual	July 1 2013 – December 31, 2013	January 31, 2014	March 27, 2014	Contrib: \$321 Expend: \$541
Semi-Annual	January 1, 2014 – June 30, 2014	July 31, 2014	October 27, 2014	Contrib: \$491 Expend: \$467
Semi-Annual	July 1, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Contrib: \$1,176 Expend: \$760

///

///

²⁵ Amounts are based on filed campaign statements.

1 Corso's Control of Taxpayers for Oceanside

2 In addition to controlling Corso for Council, Corso also controlled Taxpayers for Oceanside.
3 According to the Act, a candidate controls a committee if he or she, his or her agent, or any other
4 committee he or she controls has a significant influence on the actions or decisions of the committee. The
5 Act does not define "significant influence", but the Commission has advised that a candidate is presumed
6 to exert significant influence "...whenever the candidate is a voting member of a committee's leadership
7 body..." In an interview with Program Specialist Bob Perna ("Perna") of the Fair Political Practices
8 Commission, Corso testified that she has served as treasurer and president of Taxpayers for Oceanside
9 since January of 2013 and is a voting member of the five-person board.²⁶ Based on the Act's definition of
10 a controlled committee, Corso's ability to exert significance influence over the decisions of Taxpayers for
11 Oceanside means that she controlled Taxpayers for Oceanside.

12 As a result of Corso controlling Taxpayers for Oceanside – Taxpayers for Oceanside was required
13 to change the committee's name on the statement of organization to include the controlling candidate's
14 last name, the office being sought, and the year of the election. Taxpayers for Oceanside was also required
15 to file preelection statements because it was being controlled by Corso. Therefore, Taxpayers for
16 Oceanside violated the Act by failing to amend its statement of organization to include Corso's last name
17 and by failing to file preelection statements covering the reporting periods of July 1, 2014 – September
18 30, 2014 and October 1, 2014 – October 18, 2014.

19 **VIOLATIONS**

20 Count 1: Failure to Timely Report

21 Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a \$1,000
22 in-kind contribution from Oceanside Associates received during the preelection reporting period covering
23 July 1, 2014 – September 30, 2014, due by October 6, 2014, in violation of Government Code Section
24 84211, subdivisions (a), (c), and (f).

25 _____
26 ²⁶ Corso's statement regarding her position is supported by a statement of organization she signed, which lists Corso
27 as the treasurer and principal officer (president) of Taxpayers for Oceanside.

1 Count 2: Failure to Timely Report

2 Corso for Council and Corso failed timely file a preelection statement covering the reporting
3 period of October 1, 2014 – October 18, 2014, due by October 23, 2014, in violation of Government Code
4 Sections 84200.5, subdivision (b) and 84200.7, subdivision, (b).

5 Count 3: Failure to Timely Report

6 Corso for Council and Corso failed timely file a semi-annual campaign statement covering the
7 reporting period of October 19, 2014 – December 31, 2014, due by February 2, 2015, in violation of
8 Government Code Section 84200.

9 Count 4: Failure to Timely File

10 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
11 contribution in the form of office space from Oceanside Associates on September 30, 2014, in violation
12 of Government Code Sections 84203 and 84203.3, subdivision (b).

13 Count 5: Failure to Timely File

14 Corso for Council and Corso failed to timely file a 24-hour report after receiving contributions
15 from Bernard Blom that aggregated to \$1,000 on October 1, 2014, in violation of Government Code
16 Section 84203.

17 Count 6: Failure to Timely File

18 Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000 in-kind
19 contribution in the form of office space from Oceanside Associates on October 31, 2014, in violation of
20 Government Code Section 84203 and 84203.3, subdivision (b).

21 Count 7: Failure to Timely File

22 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
23 covering the reporting period of July 1, 2013 – December 31, 2013, due by January 31, 2014, in violation
24 of Government Code Section 84200.

25 ///

1 Count 8: Failure to Timely File

2 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
3 covering the reporting period of January 1, 2014 – June 30, 2014, due by July 31, 2014, in violation of
4 Government Code Section 84200.

5 Count 9: Failure to Timely File

6 Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
7 covering the reporting period of July 1, 2014 – December 31, 2014, in violation of Government Code
8 Section 84200.

9 Count 10: Failure to Amend Statement of Organization

10 Taxpayers for Oceanside and Corso failed to amend its statement of organization to include
11 Corso's last name in the name of the committee on or around August 17, 2014, in violation of Government
12 Code Section 84103 and Regulation 18402, subdivision (c)(1) and (2).

13 Count 11: Failure to Timely File a Preelection Statement

14 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
15 reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014, in violation of Government
16 Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

17 Count 12: Failure to Timely File a Preelection Statement

18 Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering the
19 reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014, in violation of Government
20 Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

21 **EXCULPATORY AND MITIGATING INFORMATION**

22 In mitigation, Corso for Council, Taxpayers for Oceanside, and Corso have never been penalized
23 for violating the Act.

24 In mitigation, Corso for Council timely filed 24-hour reports for three other contributions totaling
25 \$8,000.

26 ///

1 **CONCLUSION**

2 Probable cause exists to believe Corso for Council and Corso committed six violations of the Act
3 as set forth above in Counts 1 – 6. Probable Cause exists to believe that Taxpayers for Oceanside and
4 Corso committed six violations of the Act as set forth above in Counts 7 – 12. The Enforcement Division
5 respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.
6

7 Dated: 2/26/19

8 Respectfully Submitted,

9 **FAIR POLITICAL PRACTICES COMMISSION**

10 Galena West
11 Chief of Enforcement

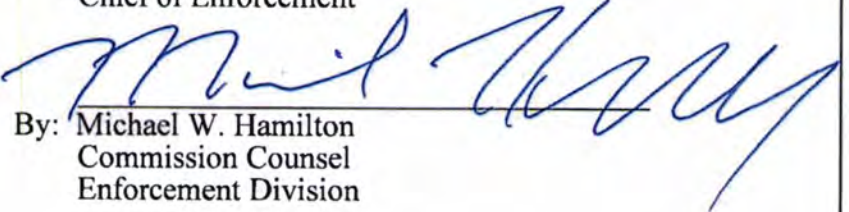
12 
By: Michael W. Hamilton
Commission Counsel
Enforcement Division

Exhibit A-8

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3	In the Matter of)	FPPC No. 15/245
4)	
5	CORSO FOR CITY COUNCIL 2014,)	FINDING OF PROBABLE CAUSE AND
6	TAXPAYERS FOR OCEANSIDE)	ORDER TO PREPARE AND SERVE AN
7	NEIGHBORHOODS, AND DANA CORSO,)	ACCUSATION
8	Respondents.)	Gov. Code § 83115.5

9 By means of an Ex Parte Request for an Order Finding Probable Cause and an Order that an
10 Accusation be Prepared and Served, the Enforcement Division submitted the above-entitled matter to the
11 Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request For a Finding
12 of Probable Cause and an Order that an Accusation be Prepared and Served (“Ex Parte Request”), the
13 Enforcement Division served a Report in Support of a Finding of Probable Cause (“PC Report”) on
14 Respondents on December 11, 2018 by substitute service. On February 28, 2018, the Enforcement
15 Division served respondents with an Amended Report in Support of Probable Cause by certified mail.
16 Dana Corso (“Corso”) was served individually and on behalf of Corso for City Council 2014 (“Corso for
17 City Council”) and Taxpayers for Oceanside Neighborhoods (“Taxpayers”) concerning this matter.
18 Accompanying the PC Report was a packet of materials that informed the Corso, Corso for City Council,
19 and Taxpayers of their right to file a written response to the PC Report and to request a probable cause
20 conference within 21 days following service of the PC Report. During the 21 days that followed service
21 of the PC Report and Amended PC Report, Corso did not file a response to the PC Report or request a
22 probable cause conference. Pursuant to California Code of Regulations title 2, section 18361.4,
23 determination of probable cause may be made solely on papers submitted when the respondent does not
24 request a probable cause conference.¹

25
26 ¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of
27 the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code
of Regulations.

1 In making a probable cause determination, it is the duty of the Hearing Officer of the Fair Political
2 Practices Commission to determine whether probable cause exists to believe that a respondent violated
3 the Political Reform Act as alleged by the Enforcement Division in the PC Report served on the
4 respondent.

5 Probable cause to believe a violation has occurred can be found to exist when “the evidence is
6 sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that
7 the proposed respondent(s) committed or caused a violation.”²

8 The Amended PC Report served on Corso, Corso for City Council, and Taxpayers and the
9 subsequent Ex Parte Request in this matter allege violations of the Political Reform Act were committed,
10 as follows:

11 Count 1: Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a
12 \$1,000 in-kind contribution from Oceanside Associates received during the preelection
13 reporting period covering July 1, 2014 – September 30, 2014, due by October 6, 2014, in
violation of Government Code Section 84211, subdivisions (a), (c), and (f).

14 Count 2: Corso for Council and Corso failed timely file a preelection statement covering the
15 reporting period of October 1, 2014 – October 18, 2014, due by October 23, 2014, in
16 violation of Government Code Sections 84200.5, subdivision (b) and 84200.7, subdivision,
(b).

17 Count 3: Corso for Council and Corso failed timely file a semi-annual campaign statement covering
18 the reporting period of October 19, 2014 – December 31, 2014, due by February 2, 2015,
in violation of Government Code Section 84200.

19 Count 4: Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000
20 in-kind contribution in the form of office space from Oceanside Associates on September
30, 2014, in violation of Government Code Sections 84203 and 84203.3, subdivision (b).

21 Count 5: Corso for Council and Corso failed to timely file a 24-hour report after receiving
22 contributions from Bernard Blom that aggregated to \$1,000 on October 1, 2014, in
violation of Government Code Section 84203.

23 Count 6: Corso for Council and Corso failed to timely file a 24-hour report after receiving a \$1,000
24 in-kind contribution in the form of office space from Oceanside Associates on October 31,
2014, in violation of Government Code Section 84203 and 84203.3, subdivision (b).

27 _____
28 ² Cal. Code Reg., tit. 2, § 18361.4, subd. (e).

1 Count 7: Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
2 covering the reporting period of July 1, 2013 – December 31, 2013, due by January 31,
2014, in violation of Government Code Section 84200.

3 Count 8: Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
4 covering the reporting period of January 1, 2014 – June 30, 2014, due by July 31, 2014, in
violation of Government Code Section 84200.

5 Count 9: Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
6 covering the reporting period of July 1, 2014 – December 31, 2014, in violation of
Government Code Section 84200.

7 Count 10: Taxpayers for Oceanside and Corso failed to amend its statement of organization to include
8 Corso's last name in the name of the committee on or around August 17, 2014, in violation
of Government Code Section 84103 and Regulation 18402, subdivision (c)(1) and (2).

9 Count 11: Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering
10 the reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014, in violation
of Government Code Sections 84200.5 subdivision (b) and 84200.7, subdivision (b).

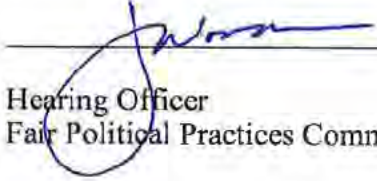
11 Count 12: Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering
12 the reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014, in
13 violation of Government Code Sections 84200.5 subdivision (b) and 84200.7, subdivision
14 (b).

14 Based on the Ex Parte Request given to me, I find that notice has been given to Corso, Corso for
15 City Council, and Taxpayers.³ I further find, based on the PC Report and the Ex Parte Request, that there
16 is probable cause to believe Corso, Corso for City Council, and Taxpayers violated the Political Reform
17 Act as alleged in Counts 1–12, as identified above.

18 I therefore direct that the Enforcement Division issue an accusation against Corso, Corso for City
19 Council, and Taxpayers in accordance with this finding.

20 IT IS SO ORDERED.

21
22
23 Dated: 4-10-17

24 
25 _____
26 Hearing Officer
27 Fair Political Practices Commission

28 ³ Government Code § 83115.5; Cal. Code Reg., tit. 2, §18361.4, subd. (b).

FPPC No. 15/245, In the matter of Corso for City Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, CA 95811. On the date below, I served the following document:

FINDING OF PROBABLE CAUSE AND ORDER TO PREPARE AND SERVE AN ACCUSATION

MANNER OF SERVICE

(U.S. Mail) By causing a true copy thereof to be served on the parties in this action through the U.S. Mail and addressed as listed below. I am familiar with the procedure of the Fair Political Practices Commission for collection and processing of correspondence for mailing with the United States Postal Service, and the fact that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business.

SERVICE LIST

**Dana Corso
Individually, and o/b/o Corso for City Council 2014
Taxpayers for Oceanside Neighborhoods**



(By Personal Service) On Thursday April 11, 2019, at approximately 3:30 p.m., I personally served:

Michael Hamilton, Commission Counsel, at 1102 Q Street, Suite 3000, Sacramento, CA 95811.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document is executed at Sacramento, California, on April 11, 2019.



Sasha Linker

Exhibit A-9

GALENA WEST
Chief of Enforcement
MICHAEL W. HAMILTON
Commission Counsel
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street, Suite 3000
Sacramento, CA 95811
Telephone: (916) 322-5772
Email: mhamilton@fppc.ca.gov

Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

In the Matter of

CORSO FOR COUNCIL 2014,¹
TAXPAYERS FOR OCEANSIDE
NEIGHBORHOODS, and DANA CORSO,

Respondents.

) OAH No. _____
) FPPC No. 15/245
) ACCUSATION
) (Gov. Code §11503)

Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding of probable cause made pursuant to Government Code section 83115.5, hereby alleges the following:

JURISDICTION

1. Complainant is the Enforcement Division of the Fair Political Practices Commission (the "Commission") and makes this Accusation in its official capacity and in the public interest.

2. The authority to bring this action is derived from California Code of Regulations, title 2, sections 18361 and 18361.4, subdivision (e), and the statutory law of the State of California, including, Government Code sections 83111, 83116, and 91000.5, which assign to the Enforcement Division the

¹ In the caption of the Report in Support of Probable Cause (the "Report"), Corso for Council 2014 is incorrectly referred to as Corso for "City" Council 2014. In the caption of this document, Corso for "City" Council 2014 has been replaced with Corso for Council 2014.

1 duty to administer, implement, and enforce the provisions of the Political Reform Act, found at
2 Government Code sections 81000 through 91014.

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

6 4. To that end, the Act must be liberally construed to achieve its purposes.⁴

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

11 RESPONDENTS

12 6. Respondent Dana Corso ("Corso") was an unsuccessful candidate for the Oceanside City
13 Council in 2014. Respondent Corso for Council 2014 ("Corso for Council") was Corso's controlled
14 committee. Respondent Taxpayers for Oceanside Neighborhoods ("Taxpayers for Oceanside") is a city
15 general purpose committee. Corso served as treasurer of Corso for Council and serves as treasurer of
16 Taxpayers for Oceanside.

17 7. Corso for Council and Corso violated the Act by failing to timely report the receipt of
18 contributions, failing to timely file a preelection statement, failing to timely file a semi-annual statement,
19 and by failing to timely file 24-hour contribution reports.

20 8. Taxpayers for Oceanside and Corso violated the Act by failing to timely file three semi-
21 annual campaign statements, failing to timely file an amendment to its statement of organization, and
22 failing to timely file two preelection campaign statements.

23 ///

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

27 ³ Sections 81001, subdivision (h), and 81002, subdivision (f).

⁴ Section 81003.

28 ⁵ Section 81002, subdivision (a).

APPLICABLE LAW

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

A. Definitions

10. A “candidate” is an individual who is listed on the ballot for election to any elective office.⁶

11. A “controlled committee” ...committee that is controlled directly or indirectly by a candidate or state measure proponent or acts jointly with a candidate, controlled committee, or state measure proponent in connection with the making of expenditures. A candidate or state measure proponent controls a committee if he or she, his or her agent, or any other committee he or she controls has a significant influence on the actions or decisions of the committee.”⁷

Under the Act, there is not a definition of “significant influence”, but the Commission has advised that a candidate is presumed to exert significant influence “...whenever the candidate is a voting member of a committee’s leadership body...”⁸

B. Duty to File Campaign Statements

12. The Act requires candidate-controlled committees to file campaign statements at specific times disclosing information regarding campaign contributions received and expenditures made by the campaign committees.⁹

13. Every committee must have a treasurer.¹⁰ A treasurer is liable, along with the candidate and the committee, for any failure to comply with the Act’s campaign reporting requirements.¹¹

14. Candidates for city office must file campaign statements with the clerk of the city.¹²

C. Duty to File Semi-Annual Campaign Statements

15. The Act requires candidates and committees to file semi-annual statements each year “...no later than July 31 for the period ending June 30, and no later than January 31, for the period ending

⁶ Section 82007.

⁷ Section 82016, subdivision (a).

⁸ *Ferguson* Advice Letter, No. A-86-044. FPPC advice letters are issued pursuant to Government Code section 83114, subdivision (b), and California Code of Regulations, title 2, section 18329. They offer guidance to the public, and under certain circumstances, the requestor may use the advice as a defense in an enforcement proceeding. Although the ultimate resolution of legal issues regarding statutory interpretation lies with the courts, the advice of the FPPC as an agency empowered by the Legislature to interpret and enforce the Political Reform Act is entitled to weight (Section 83114).

⁹ Sections 84200 through 84225.

¹⁰ Section 84100.

¹¹ Sections 83116.5 and 91006.

¹² Section 84215, subdivisions (d) and (f).

1 December 31...”¹³ However, if the due date falls on a Saturday, Sunday, or official state holiday, “the
2 filing deadline for such a statement or report shall be extended to the next regular business day.”¹⁴

3 **D. Preelection Campaign Statements**

4 16. The Act states that “...all candidates ...being voted upon the on the first Tuesday after the
5 first Monday in June or November, their controlled committees, and committees primarily formed to
6 support or oppose those candidates...shall file a preelection statement...”¹⁵ A candidate and her
7 controlled committee are required to file a preelection statement no later than October 5 for the period
8 ending September 30 and for the period ending 17 days before an election the statement shall be filed no
9 later than 12 days before the election.¹⁶

10 **E. Contents of a Campaign Statement**

11 17. The Act requires each campaign statement to contain information pertaining to the total
12 amount of contributions received during the applicable period, the total amount of expenditures made
13 during the applicable period, and the name, street address, occupation, and employer of any contributor
14 that has made contributions totaling more than \$100 in the applicable period.¹⁷

15 **F. Statement of Organization Amendments**

16 18. The Act requires committees to file an amendment statement of organization within ten
17 days to reflect any changes.¹⁸

18 **G. Naming a Controlled Committee**

19 19. The Act requires the name of a candidate controlled committee to include the last name of
20 the controlling candidate, the office sought, and the year of the election.¹⁹

21 **H. 24-Hour Contribution Reports**

22 20. Under the Act, a late contribution is defined as “a contribution, including a loan, that totals
23 in the aggregate one thousand dollars (\$1,000) or more and is made to or received by a candidate, a
24

25 ¹³ Section 84200, subdivision (a).

¹⁴ Regulation 18116, subdivision (a).

¹⁵ Former Section 84200.5, subdivision (b).

¹⁶ Section 84200.7, subdivision (b)(1) and (2).

¹⁷ Section 84211, subdivisions (a), (b), and (f).

¹⁸ Section 84103.

¹⁹ Former Regulation 18402, subdivision (c)(1) and (2).

1 controlled committee, or a committee formed or existing primarily to support or oppose a candidate or
2 measure within 90 days before the date of the election...²⁰ A candidate or committee that makes or
3 receives a late monetary contribution is required to report within 24-hours of making or receiving a late
4 contribution.²¹ Additionally, a candidate or committee that receives a late in-kind contribution shall report
5 that activity within 48 hours of receiving a late in-kind contribution.²²

6 **I. Candidate and Treasurer Liability**

7 21. Under the Act, it is the duty of the candidate and treasurer of a controlled committee to
8 ensure that the committee complies with all the requirements of the Act concerning the receipt,
9 expenditure, and reporting of funds.²³ The candidate and treasurer may be held jointly and severally
10 liable, along with the committee, for violations committed by the committee.²⁴

11 **J. Liability for Violations**

12 22. Under the Act, "Any person who violates any provision of this title, who purposely or
13 negligently causes any other person to violate any provision of this title, or who aids and abets any other
14 person in the violation of this title shall be liable...this section shall only apply to persons who have filing
15 or reporting obligations under this title, or who are compensated for services involving the planning,
16 organizing, or directing any activity regulated or required by this title..."²⁵

17 **K. Factors for the Commission to Consider**

18 23. In framing a proposed order following a finding of a violation pursuant to section 83116,
19 the Fair Political Practices Commission, and the administrative law judge, shall consider all the
20 surrounding circumstances, including: (1) the seriousness of the violation; (2) the presence or absence of
21 any intention to conceal, deceive or mislead; (3) whether the violation was deliberate, negligent or
22 inadvertent; (4) whether the violator demonstrated good faith by consulting the Commission staff or any
23 other government agency in a manner not constituting a complete defense under section 83114(b); (5)

24
25 ²⁰ Former Section 82036, subdivision (a).

26 ²¹ Section 84203, subdivision (a) and (b).

27 ²² Section 84203.3, subdivision (b).

28 ²³ Sections 81004, 84100 84213, and Regulation 18427.

²⁴ Sections 83116.5 and 91006.

²⁵ Section 83116.5.

1 whether the violation was isolated or part of a pattern and whether the violator has a prior record of
2 violations of the Act or similar laws; and (6) whether the violator, upon learning of a reporting violation,
3 voluntarily filed amendments to provide full disclosure.²⁶

4 **GENERAL FACTS**

5 24. This matter was opened based on an audit of Corso for Council conducted by the California
6 Franchise Tax Board (“FTB”) covering the period of January 1, 2014 – December 31, 2014 and based on
7 complaints alleging Corso for Council and Taxpayers for Oceanside were not in compliance with the filing
8 requirements of the Act.

9 25. Corso for Council qualified as a committee on or around August 17, 2014. Corso for
10 Council reported receiving contributions totaling approximately \$26,388 in contributions and making
11 expenditures totaling approximately \$25,194.

12 26. At the time, Corso was running for city council, Corso was also serving as the treasurer of
13 Taxpayers for Oceanside, which is a role she began on or around March 18, 2013.

14 27. On November 4, 2014, Corso was an unsuccessful candidate in the County of San Diego’s
15 General Election for Oceanside City Council.

16 **Corso for Council Reporting and Filing**

17 28. The evidence establishes that during Corso’s 2014 campaign for Oceanside City Council,
18 Corso for Council and Corso committed the following reporting and filing violations:

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27 ²⁶ Regulation 18361.5, subd. (d).

Failure to Timely Report

Statement	Reporting Period	Monetary contributions	In-Kind contributions	Due Date	Date of Filing	Date of Amendment Reporting Contribution
Preelection (failure to timely report)	July 1, 2014 – September 30, 2014	A \$200 Contribution from Corso was not timely reported	A \$1,000 in-kind contribution from Oceanside Associates was not timely reported	October 6, 2014	October 6, 2014	July 15, 2015, Corso amended to include in-kind contribution but she reported the office space as valued at \$1,000 for 2 1/2 months instead of \$1,000 for the reporting period

Failure to Timely File Preelection and Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Aggravating Factors:
Preelection	October 1, 2014 – October 18, 2014	October 23, 2014	October 27, 2014	In aggravation, a \$581 in-kind contribution from Oceanside Associates was not reported on the preelection statement when it was filed. Instead it was reported on an amendment to the semi-annual statement ending December 31, 2014. ²⁷ In aggravation, Corso for Council used the reporting period of Oct 1, 2014 – October 22, 2014, instead of the correct reporting period, which was October 1, 2014 – October 18, 2014.
Semi-Annual (Failure to timely file)	October 19, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	In aggravation, once Corso filed she over-reported the loans she made to the campaign by \$2,010. FTB determined Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no transactions that matched Corso's reported amount. In aggravation, a \$919 in-kind contribution from Oceanside Associates was not timely reported

²⁷ The in-kind contribution totals the amount incurred during the period. For example, the total for the month was \$1,000, but amount incurred during the period was \$581.

24-Hour Contribution Reports

Date Received	Contributor	Amount	Date Filed
September 30, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed
October 1, 2014	Bernard Blom	\$1,000 in total monetary contributions	Not filed
October 31, 2014	Oceanside Associates	\$1,000 non-monetary contribution for office space	Not filed

Taxpayers for Oceanside Filing Violations

29. Taxpayers for Oceanside failed to timely file the following statements:

Semi-Annual Campaign Statements

Statement	Reporting Period	Due Date	Date of Filing	Activity²⁸
Semi-Annual	July 1 2013 – December 31, 2013	January 31, 2014	March 27, 2014	Contrib: \$321 Expend: \$541
Semi-Annual	January 1, 2014 – June 30, 2014	July 31, 2014	October 27, 2014	Contrib: \$491 Expend: \$467
Semi-Annual	July 1, 2014 – December 31, 2014	February 2, 2015	May 11, 2015	Contrib: \$1,176 Expend: \$760

30. In addition to controlling Corso for Council, Corso also controlled Taxpayers for Oceanside. According to the Act, a candidate controls a committee if he or she, his or her agent, or any other committee he or she controls has a significant influence on the actions or decisions of the committee.

31. The Act does not define “significant influence”, but the Commission has advised that a candidate is presumed to exert significant influence “...whenever the candidate is a voting member of a committee’s leadership body...”

²⁸ Amounts are based on filed campaign statements.

1 In an interview with Program Specialist Bob Perna (“Perna”) of the Fair Political Practices
2 Commission, Corso testified that she has served as treasurer and president of Taxpayers for Oceanside
3 since January of 2013 and is a voting member of the five-person board. Based on the Act’s definition of
4 a controlled committee, Corso’s ability to exert significance influence over the decisions of Taxpayers for
5 Oceanside means that she controlled Taxpayers for Oceanside.

6 32. As a result of Corso simultaneously running for city council and controlling Taxpayers for
7 Oceanside – Taxpayers for Oceanside was required to change the committee’s name on the statement of
8 organization to include the controlling candidate’s last name, the office being sought, and the year of the
9 election within 10 days of Corso for Council qualifying as a committee to reflect the change in status.

10 33. Taxpayers for Oceanside was also required to file preelection statements because it was
11 controlled by Corso. The evidence establishes that Taxpayers for Oceanside failed to amend its statement
12 of organization to include Corso’s last name and to file preelection statements covering the reporting
13 periods of July 1, 2014 – September 30, 2014 and October 1, 2014 – October 18, 2014.

14 **PROCEDURAL HISTORY**

15 34. The Enforcement Division initiated this administrative action against Corso for Council,
16 Taxpayers for Oceanside, and Corso by serving them with a Report in Support of a Finding of Probable
17 Cause (the “Report”). Corso was sub-served on December 1, 2018 – making service effective on
18 December 11, 2018.²⁹

19 35. Corso did not request a probable cause hearing within 21 days of being served with the
20 Report thereby waiving their rights to a probable cause hearing.³⁰

21 36. On February 26, 2019, an Amended Report in Support of Probable Cause was mailed to
22 Corso via certified mail. On March 4, 2019, the certified mail receipt was returned to the Enforcement
23 Division and dated February 28.

24 37. Corso did not request a probable cause hearing within 21 days of being served with the
25 Report thereby waiving their rights to a probable cause hearing.

26
27 ²⁹ Sections 83115.5 and 91000.5.

³⁰ Section 83115 and Regulation 18361.4

1 38. By means of an Ex Parte Request for an Order Finding Probable Cause and an Order that
2 an Accusation be Prepared and Served, dated April 10, 2019, the Enforcement Division submitted the
3 matter to the Hearing Officer for a determination of Probable Cause.

4 39. On or about April 10, 2019, the Commission's Hearing Officer issued an order, based on
5 the Ex Parte Request for an Order Finding of Probable Cause and the Amended PC Report, that there was
6 probable cause to believe Corso for Council, Taxpayers for Oceanside, and Corso violated the Act, and
7 directed the Enforcement Division to issue an accusation against Corso for Council, Taxpayers for
8 Oceanside, and Corso in accordance with the finding. A copy of that order was served on Corso by U.S.
9 mail on April 11, 2019.

10 **VIOLATIONS**

11 40. Corso for Council, Taxpayers for Oceanside, and Corso committed twelve violations of
12 the Act, as follows:

13 **Count 1**

14 **Failure to Timely Report**

15 41. Complainant incorporates paragraphs 1 – 40 of this Accusation, as though completely set
16 forth herein.

17 42. Corso for Council and Corso had a duty to timely report a \$200 contribution from Corso
18 and a \$1,000 in-kind contribution from Oceanside Associates received during the preelection reporting
19 period covering July 1, 2014 – September 30, 2014, due by October 6, 2014 deadline.

20 43. Corso for Council and Corso failed to timely report a \$200 contribution from Corso and a
21 \$1,000 in-kind contribution from Oceanside Associates by the October 6, 2014 deadline.

22 44. By failing to timely report a \$200 contribution from Corso and a \$1,000 in-kind
23 contribution from Oceanside Associates by the October 6, 2014 deadline, Corso for Council and Corso
24 violated Government Code Section 84211, subdivisions (a), (c), and (f).

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27 ///

1 **Count 2**

2 **Failure to Timely File a Pre-Election Campaign Statement**

3 45. Complainant incorporates paragraphs 1 – 44 of this Accusation, as though completely set
4 forth herein.

5 46. Corso for Council and Corso had a duty to timely file a preelection statement covering the
6 reporting period of October 1, 2014 – October 18, 2014, due by October 23, 2014 deadline.

7 47. Corso for Council and Corso failed to timely file the required preelection statement by
8 October 23, 2014 deadline.

9 48. By failing to timely file the pre-election campaign statement by the October 23, 2014,
10 deadline, Corso for Council and Corso violated Government Code Section 84200.5, subdivision (b) and
11 84200.7, subdivision (b).

12 **Count 3**

13 **Failure to Timely File a Semi-Annual Campaign Statement**

14 49. Complainant incorporates paragraphs 1 – 48 of this Accusation, as though completely set
15 forth herein.

16 50. Corso for Council and Corso had a duty to timely file a semi-annual campaign statement
17 for the period covering October 19, 2014 – December 31, 2014, due by the February 2, 2015 deadline.

18 51. Corso for Council and Corso failed to timely file the required semi-annual campaign
19 statement by the February 2, 2015.

20 52. By failing to timely file the semi-annual campaign statement by the February 2, 2015
21 deadline, Corso for Council and Corso violated Government Code Section 84200.

22 **Count 4**

23 **Failure to Timely File a 24-Hour Contribution Report**

24 53. Complainant incorporates paragraphs 1 – 52 of this Accusation, as though completely set
25 forth herein.

1 54. Corso for Council and Corso had a duty to timely file a file a 24-hour contribution report
2 after receiving a \$1,000 in-kind contribution in the form of office space from Oceanside Associates on
3 September 30, 2014.

4 55. Corso for Council and Corso failed to timely file a file a 24-hour contribution report after
5 receiving a \$1,000 in-kind contribution in the form of office space from Oceanside Associates on
6 September 30, 2014.

7 56. By failing to timely file a file a 24-hour contribution report after receiving a \$1,000 in-kind
8 contribution in the form of office space from Oceanside Associates on September 30, 2014, Corso for
9 Council and Corso violated Government Code Sections 84203 and 84203.3, subdivision (b).

10 **Count 5**

11 **Failure to Timely File a 24-Hour Contribution Report**

12 57. Complainant incorporates paragraphs 1 – 56 of this Accusation, as though completely set
13 forth herein.

14 58. Corso for Council and Corso had a duty to timely file a 24-hour contribution report after
15 receiving contributions from Bernard Blom that aggregated to \$1,000 on October 1, 2014.

16 59. Corso for Council and Corso failed to timely file a 24-hour contribution report after
17 receiving contributions from Bernard Blom that aggregated to \$1,000 on October 1, 2014.

18 60. By failing to timely file a 24-hour contribution report after receiving contributions from
19 Bernard Blom that aggregated to \$1,000 on October 1, 2014, Corso for Council and Corso violated
20 Government Code Sections 84203.

21 **Count 6**

22 **Failure to Timely File a 24-Hour Contribution Report**

23 61. Complainant incorporates paragraphs 1-60 of this Accusation, as though completely set
24 forth herein.

25 62. Corso for Council and Corso had a duty to timely file a 24-hour contribution report after
26 receiving a \$1,000 in-kind contribution in the form of office space from Oceanside Associates on October
27 31, 2014.

1 **Count 9**

2 **Failure to Timely File a Semi-Annual Campaign Statement**

3 73. Complainant incorporates paragraphs 1-72 of this Accusation, as though completely set
4 forth herein.

5 74. Taxpayers for Oceanside and Corso had a duty to timely file a semi-annual campaign
6 statement covering the reporting period of July 1, 2014 – December 31, 2014, due by February 2, 2015.

7 75. Taxpayers for Oceanside and Corso failed to timely file a semi-annual campaign statement
8 covering the reporting period of July 1, 2014 – December 31, 2014, due by February 2, 2015.

9 76. By failing to timely file the semi-annual campaign statement by the February 2, 2015
10 deadline, Taxpayers for Oceanside and Corso violated Government Code Section 84200.

11 **Count 10**

12 **Amended Statement of Organization**

13 77. Complainant incorporates paragraphs 1-76 of this Accusation, as though completely set
14 forth herein.

15 78. Taxpayers for Oceanside and Corso had a duty to amend its statement of organization on
16 or around August 17, 2014 to include Corso's last name in the name of the committee, the office being
17 sought, and the year of the election.

18 79. Taxpayers for Oceanside and Corso failed to amend its statement of organization on or
19 around August 17, 2014 to include Corso's last name in the name of the committee, the office being
20 sought, and the year of the election.

21 80. By failing to timely amend the statement of organization, Taxpayers for Oceanside and
22 Corso violated Government Code Section 84103 and Regulation 18402, subdivisions (c)(1) and (2).

23 **Count 11**

24 **Failure to Timely File a Pre-Election Campaign Statement**

25 81. Complainant incorporates paragraphs 1-80 of this Accusation, as though completely set
26 forth herein.

1 82. Taxpayers for Oceanside and Corso had a duty to timely file a preelection statement
2 covering the reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014.

3 83. Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering
4 the reporting period of July 1, 2014 – September 30, 2014, due October 6, 2014.

5 84. By failing to timely file the preelection statement by the October 6, 2014 deadline, the
6 Taxpayers for Oceanside and Corso violated Government Code Sections 84200.5 subdivision (b) and
7 84200.7, subdivision (b).

8 **Count 12**

9 **Failure to Timely File a Pre-Election Campaign Statement**

10 85. Complainant incorporates paragraphs 1-84 of this Accusation, as though completely set
11 forth herein.

12 86. Taxpayers for Oceanside and Corso had a duty to timely file a preelection statement
13 covering the reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014.

14 87. Taxpayers for Oceanside and Corso failed to timely file a preelection statement covering
15 the reporting period of October 1, 2014 – October 18, 2014, due October 23, 2014 deadline.

16 88. By failing to timely file a preelection statement by the October 23, 2014 deadline, the
17 Taxpayers for Oceanside and Corso violated Government Code Sections 84200.5 subdivision (b) and
18 84200.7, subdivision (b).

19 **AGGRAVATING FACTORS**

20 89. Corso never filed the outstanding 24-hour contribution reports.

21 **MITIGATING OR EXCULPATORY FACTORS**

22 90. In mitigation, Corso's campaign was unsuccessful.

23 91. In mitigation, Corso for Council, Taxpayers for Oceanside, and Corso have never been
24 penalized for violating the Act.

25 92. In mitigation, Corso for Council and Corso filed the outstanding statements after the
26 required due dates.

1 8. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),
2 order Taxpayers for Oceanside and Corso to pay a monetary penalty of up to Five Thousand Dollars
3 (\$5,000) for the violation of the Act alleged in **Count 7**;

4 9. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),
5 order Taxpayers for Oceanside and Corso to pay a monetary penalty of up to Five Thousand Dollars
6 (\$5,000) for the violation of the Act alleged in **Count 8**;

7 10. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),
8 order Taxpayers for Oceanside and Corso to pay a monetary penalty of up to Five Thousand Dollars
9 (\$5,000) for the violation of the Act alleged in **Count 9**;

10 11. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),
11 order Taxpayers for Oceanside and Corso to pay a monetary penalty of up to Five Thousand Dollars
12 (\$5,000) for the violation of the Act alleged in **Count 10**;

13 12. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),
14 order Taxpayers for Oceanside and Corso to pay a monetary penalty of up to Five Thousand Dollars
15 (\$5,000) for the violation of the Act alleged in **Count 11**;

16 13. That the Fair Political Practices Commission, pursuant to section 83116, subdivision (c),
17 order Taxpayers for Oceanside and Corso to pay a monetary penalty of up to Five Thousand Dollars
18 (\$5,000) for the violation of the Act alleged in **Count 12**;

19 14. That the Fair Political Practices Commission, pursuant to regulation 18361.5, subdivision
20 (d), consider the following factors in framing a proposed order following a finding of a violation pursuant
21 to Section 83116: (1) the seriousness of the violation; (2) the presence or absence of any intention to
22 conceal, deceive or mislead; (3) whether the violation was deliberate, negligent or inadvertent; (4) whether
23 the violator demonstrated good faith by consulting the Commission staff or any other government agency
24 in a manner not constituting a complete defense under section 83114(b); (5) whether the violation was
25 isolated or part of a pattern and whether the violator has a prior record of violations of the Act or similar
26 laws; and (6) whether the violator, upon learning of a reporting violation, voluntarily filed amendments to
27 provide full disclosure.

1 15. That the Fair Political Practices Commission grant such other and further relief as it deems
2 just and proper.

3
4 Dated: 16 Aug 19

5 Respectfully Submitted,

6 **FAIR POLITICAL PRACTICES COMMISSION**

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8 _____
9 Galena West
 Enforcement Chief
 Enforcement Division

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Exhibit A-10

Affidavit of Process Server

Before the Fair Political Practices Commission, State of California

vs In The Matter of Corso For Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso Case Number: 15/245

I **K. Wysong**, being first duly sworn, depose and say: that I am over the age of 18 years and not a part to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said service.

Party Served: **Dana Corso**

Documents Served: **Statement to Respondent, Accusation; Notice of Defense; California Government Code Sections 11506 through 11508**

Served at Place of Business: **5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003**

Date Served: **10/1/2019** Time of Service: **11:00 AM**

By leaving with **Elizabeth Johnson - Receptionist**

Description of person served

Age: [REDACTED]

Weight: [REDACTED]

Hair: [REDACTED]

Sex: [REDACTED]

Height: [REDACTED]

Eyes: [REDACTED]

Skln: [REDACTED]

Marks: [REDACTED]

Manner of Service:

- PERSONAL SERVICE:** By personally delivering copies to the person being served.
- SUBSTITUTED SERVICE AT RESIDENCE:** By personally delivering copies to the dwelling house or usual place of abode of the person (or authorized person on behalf of an entity) being served. Person receiving documents must be at least 18 years of age and should be informed of the general nature of the papers.
- SUBSTITUTED SERVICE AT BUSINESS:** By leaving, during normal business hours, copies at the office of the person/entity being served with the person apparently in charge thereof.
- POSTING:** By posting copies in a conspicuous manner to the front door of the person/entity being served.
- MAILING:** I also placed a copy of the documents in the mail on 10/1/2019 from San Diego, CA *by First Class mail K.W.*
-
- Non-Service:** After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):
- Unknown at Address** **Moved, Left no Forwarding** **Service Cancelled by Litigant** **Unable to serve in a Timely Fashion**
Address Does Not Exist Other:

I DECLARE UNDER PENALTY OF PERJURY THE FOREGOING IS TRUE AND CORRECT.


SIGNATURE OF PROCESS SERVER

K. Wysong RPS: 1802

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Galena West California Fair Political Practices Commission 1102 Q Street Ste. 3000 Sacramento, CA 95811 TELEPHONE NO.: (916) 322-8185 FAX NO. E-MAIL ADDRESS (Optional): sjevorkyan@fppc.ca.gov ATTORNEY FOR (Name):	FOR COURT USE ONLY
Before the Fair Political Practices Commission, State of California STREET ADDRESS: 1102 Q Street Suite 3000 MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95811 BRANCH NAME:	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT: In The Matter of Corso For Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso	CASE NUMBER: 15/245
DECLARATION OF DILIGENCE	Ref. No. or File No.: 39505

I, K. Wysong, declare: I am a Registered Process Server and was retained to serve process in the above-referenced matter on the following person or entity: Dana Corso as follows:
 Documents:

Statement to Respondent, Accusation; Notice of Defense; California Government Code Sections 11506 through 11508;

I attempted personal service on the following dates and times with the following results:

Date	Time	Location	Results
9/12/2019	9:12 AM	Business	Subject not in office, per receptionist. She claims subject is in and out. - K. Wysong 5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003
9/14/2019	1:53 PM	Business	Subject not in, per co-worker. She comes and goes. No set schedule. - K. Wysong 5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003
9/20/2019	10:34 AM	Business	Subject not in office today, per receptionist. Subject has not been in the office in two weeks. Has no set schedule or upcoming appointments. Left contact card. - K. Wysong 5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003
9/23/2019	1:10 PM	Business	Not in, per receptionist - K. Wysong 5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003
10/1/2019	11:00 AM	Business	Substituted service on: Dana Corso; 5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003; by serving: Elizabeth Johnson - Receptionist, Female [REDACTED]
10/1/2019			Mailed copy of documents to: Dana Corso. 5256 S. Mission Rd. Ste. 310, Bonsall, CA 92003

Fee for Service: **\$ 200.00**

County: **San Diego**
 Registration No.: **1802**
San Diego Service of Process, LLC
 2445 Morena Blvd. Suite 201
 San Diego, CA 92110
 (619) 275-6400

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 15, 2019.



Signature: _____

K. Wysong

Exhibit A-11



FAIR POLITICAL PRACTICES COMMISSION

1102 Q St • Suite 3000 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

STATEMENT TO RESPONDENT

[Government Code Section 11505, subdivision (b)]

*Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso
FPPC Case No. 15/245*

Enclosed is an Accusation, which was filed with the Fair Political Practices Commission (the "FPPC") and which is hereby served upon you, along with two copies of a Notice of Defense and Government Code Sections 11506 through 11508.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the FPPC within 15 days after the Accusation was served on you, the FPPC may proceed upon the Accusation without a hearing. The request for a hearing may be made by delivering or mailing the enclosed form entitled Notice of Defense, or by delivering or mailing a notice of defense as provided by Section 11506 of the Government Code to the Commission Assistant at the FPPC.

You may, but need not, be represented by counsel at any or all stages of these proceedings.

If you desire a list of the names and addresses of witnesses against you, or an opportunity to inspect and copy the items mentioned in Section 11507.6 of the Government Code that are in the possession, custody, or control of this agency, or if you wish to discuss the possibility of resolving this matter without a formal hearing, you may contact Michael W. Hamilton, Commission Counsel, FPPC Enforcement Division at 916-322-5772.

The hearing may be postponed for good cause. If you have good cause, you are obliged to notify the FPPC or, if an administrative law judge has been assigned to the hearing, the Office of Administrative Hearings, within 10 working days after you discover the good cause. Failure to give notice within 10 days will deprive you of a postponement.

After a hearing, the FPPC will consider the following factors in determining whether to assess a penalty (Title 2, California Code of Regulations, Section 18361.5, subdivision (d).):

1. The seriousness of the violation;
2. The presence or absence of any intention to conceal, deceive, or mislead;
3. Whether the violation was deliberate, negligent, or inadvertent;
4. Whether the violator demonstrated good faith by consulting Commission staff or any other government agency in a manner not constituting a complete defense under Government Code Section 83114, subdivision (b);

5. Whether the violation was isolated or part of a pattern;
6. Whether the violator has a prior record of violations of the Political Reform Act or similar laws;
and
7. Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.



Before the Fair Political Practices Commission

State of California

In the Matter of)	NOTICE OF DEFENSE
)	(Pursuant to Gov. Code § 11506)
)	
CORSO FOR COUNCIL 2014,)	FPPC Case No. 15/245
TAXPAYERS FOR OCEANSIDE)	
NEIGHBORHOODS, and DANA)	
CORSO)	
)	
Respondents.)	

Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso, respondents named in the above entitled proceeding, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

GROUND FOR NOTICE OF DEFENSE

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
 - a) I admit the Accusation in whole.
 - b) I admit the Accusation in part as indicated below:

- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: _____

Respondent

Print Name

Mailing Address

City, State, Zip



Before the Fair Political Practices Commission

State of California

In the Matter of)	NOTICE OF DEFENSE
)	(Pursuant to Gov. Code § 11506)
)	
CORSO FOR COUNCIL 2014,)	FPPC Case No. 15/245
TAXPAYERS FOR OCEANSIDE)	
NEIGHBORHOODS, and DANA)	
CORSO)	
)	
Respondents.)	

Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso, respondents named in the above entitled proceeding, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

GROUND FOR NOTICE OF DEFENSE

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
 - a) I admit the Accusation in whole.
 - b) I admit the Accusation in part as indicated below:

- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: _____

Respondent

Print Name

Mailing Address

City, State, Zip

California Government Code sections 11506 through 11508

§ 11506. Filing of notice of defense or notice of participation; Contents; Right to hearing on the merits

(a) Within 15 days after service of the accusation or District Statement of Reduction in Force the respondent may file with the agency a notice of defense, or, as applicable, notice of participation, in which the respondent may:

(1) Request a hearing.

(2) Object to the accusation or District Statement of Reduction in Force upon the ground that it does not state acts or omissions upon which the agency may proceed.

(3) Object to the form of the accusation or District Statement of Reduction in Force on the ground that it is so indefinite or uncertain that the respondent cannot identify the transaction or prepare a defense.

(4) Admit the accusation or District Statement of Reduction in Force in whole or in part.

(5) Present new matter by way of defense.

(6) Object to the accusation or District Statement of Reduction in Force upon the ground that, under the circumstances, compliance with the requirements of a regulation would result in a material violation of another regulation enacted by another department affecting substantive rights.

(b) Within the time specified the respondent may file one or more notices of defense, or, as applicable, notices of participation, upon any or all of these grounds but all of these notices shall be filed within that period unless the agency in its discretion authorizes the filing of a later notice.

(c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense or notice of participation, and the notice shall be deemed a specific denial of all parts of the accusation or District Statement of Reduction in Force not expressly admitted. Failure to file a notice of defense or notice of participation shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing. Unless objection is taken as provided in paragraph (3) of subdivision (a), all objections to the form of the accusation or District Statement of Reduction in Force shall be deemed waived.

(d) The notice of defense or notice of participation shall be in writing signed by or on behalf of the respondent and shall state the respondent's mailing address. It need not be verified or follow any particular form.

(e) As used in this section, "file," "files," "filed," or "filing" means "delivered or mailed" to the agency as provided in Section 11505.

HISTORY: Added Stats 1945 ch 867 § 1. Amended Stats 1963 ch 931 § 1; Stats 1982 ch 606 § 1; Stats 1986 ch 951 § 20; Stats 1995 ch 938 § 29 (SB 523), operative July 1, 1997; Stats 2013 ch 90 § 5 (SB 546), effective January 1, 2014.

§ 11507. Amended or supplemental accusation or District Statement of Reduction in Force; Objections

At any time before the matter is submitted for decision, the agency may file, or permit the filing of, an amended or supplemental accusation or District Statement of Reduction in Force. All parties shall be notified of the filing. If the amended or supplemental accusation or District Statement of Reduction in Force presents new charges, the agency shall afford the respondent a reasonable opportunity to prepare his or her defense to the new charges, but he or she shall not be entitled to file a further pleading unless the agency in its discretion so orders. Any new charges shall be deemed controverted, and any objections to the amended or supplemental accusation or District Statement of Reduction in Force may be made orally and shall be noted in the record.

HISTORY: Added Stats 1945 ch 867 § 1. Amended Stats 2013 ch 90 § 6 (SB 546), effective January 1, 2014; Stats 2014 ch 71 § 69 (SB 1304), effective January 1, 2015.

§ 11507.3. Consolidated proceedings; Separate hearings

(a) When proceedings that involve a common question of law or fact are pending, the administrative law judge on the judge's own motion or on motion of a party may order a joint hearing of any or all the matters at issue in the proceedings. The administrative law judge may order all the proceedings consolidated and may make orders concerning the procedure that may tend to avoid unnecessary costs or delay.

(b) The administrative law judge on the judge's own motion or on motion of a party, in furtherance of convenience or to avoid prejudice or when separate hearings will be conducive to expedition and economy, may order a separate hearing of any issue, including an issue raised in the notice of defense or notice of participation, or of any number of issues.

HISTORY: Added Stats 1995 ch 938 § 30 (SB 523), operative July 1, 1997. Amended Stats 2013 ch 90 § 7 (SB 546), effective January 1, 2014.

///

§ 11507.5. Exclusivity of discovery provisions

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

HISTORY: Added Stats 1968 ch 808 § 3.

§ 11507.6. Request for discovery

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

HISTORY: Added Stats 1968 ch 808 § 4. Amended Stats 1985 ch 1328 § 5; Stats 1995 ch 938 § 31 (SB 523), operative July 1, 1997.

§ 11507.7. Motion to compel discovery; Order

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of *Section 915 of the Evidence Code* and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become

effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

HISTORY: Added Stats 1968 ch 808 § 5. Amended Stats 1971 ch 1303 § 8; Stats 1980 ch 548 § 2; Stats 1995 ch 938 § 32 (SB 523), operative July 1, 1997.

§ 11508. Time and place of hearing

(a) The agency shall consult the office, and subject to the availability of its staff, shall determine the time and place of the hearing. The hearing shall be held at a hearing facility maintained by the office in Sacramento, Oakland, Los Angeles, or San Diego and shall be held at the facility that is closest to the location where the transaction occurred or the respondent resides.

(b) Notwithstanding subdivision (a), the hearing may be held at either of the following places:

(1) A place selected by the agency that is closer to the location where the transaction occurred or the respondent resides.

(2) A place within the state selected by agreement of the parties.

(c) The respondent may move for, and the administrative law judge has discretion to grant or deny, a change in the place of the hearing. A motion for a change in the place of the hearing shall be made within 10 days after service of the notice of hearing on the respondent.

Unless good cause is identified in writing by the administrative law judge, hearings shall be held in a facility maintained by the office.

HISTORY: Added Stats 1945 ch 867 § 1. Amended Stats 1963 ch 710 § 1; Stats 1967 ch 17 § 39; Stats 1987 ch 50 § 1; Stats 1995 ch 938 § 33 (SB 523), operative July 1, 1997; Stats 2005 ch 674 § 22 (SB 231), effective January 1, 2006.

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Sacramento, California 95811. On 8/16/19, I served the following document(s):

- 1. Statement to Respondent;
- 2. FPPC Case No. 15/245: Accusation;
- 3. Notice of Defense (Two Copies);
- 4. Selected Sections of the California Government Code, Administrative Procedure Act.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By personal service. At 12:34 a.m./p.m.:

I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Personal Service

Dana Corso
Individually, and o/b/o Corso for Council 2014, and Taxpayers for
Oceanside Neighborhoods



I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 8/16/19.



Suzanna Gevorgyan

Exhibit A-12

1368687

Statement of Organization Recipient Committee

Statement Type: [X] Initial, [] Amendment, [] Termination - See Part 5. Includes date stamps: 2014 AUG -5 AM 9:35 and REC'D S.D. CO. ROV.

RECEIVED stamps from Oceanside City Clerk and California Form 410 dated AUG 06 2014.

1. Committee Information

NAME OF COMMITTEE: Corso For Council 2014. ADDRESS: 5838 Ranchview Rd, Oceanside, CA 92057. COUNTY OF DOMICILE: San Diego.

2. Treasurer and Other Principal Officers

NAME OF TREASURER: Dana Corso. ADDRESS: 5838 Ranchview Rd, Oceanside, CA 92057. Includes date stamp: JUL 28 2014.

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 07/15/2014 By Dana Corso (Signature). Includes lines for CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT.

RECEIVED stamp dated AUG 06 2014 from OCEANSIDE CITY CLERK.

**Statement of Organization
Recipient Committee**

INSTRUCTIONS ON REVERSE

**CALIFORNIA
FORM 410**

COMMITTEE NAME

Corso For Council 2014

Page 2

I.D. NUMBER

- All committees must list the financial institution where the campaign bank account is located.

NAME OF FINANCIAL INSTITUTION

AREA CODE/PHONE

BANK ACCOUNT NUMBER

ADDRESS

CITY

STATE

ZIP CODE

4. Type of Committee Complete the applicable sections

Controlled Committee

- List the name of each controlling officeholder, candidate, or state measure proponent. If candidate or officeholder controlled, also list the elective office sought or held, and district number, if any, and the year of the election.
- List the political party with which each officeholder or candidate is affiliated or check "nonpartisan."
- If this committee acts jointly with another controlled committee, list the name and identification number of the other controlled committee.

NAME OF CANDIDATE/OFFICEHOLDER/STATE MEASURE PROPONENT	ELECTIVE OFFICE SOUGHT OR HELD (INCLUDE DISTRICT NUMBER IF APPLICABLE)	YEAR OF ELECTION	PARTY
Dana Corso	City Council	2014	<input type="checkbox"/> Nonpartisan
			<input type="checkbox"/> Nonpartisan

Primarily Formed Committee

Primarily formed to support or oppose specific candidates or measures in a single election. List below:

CANDIDATE(S) NAME OR MEASURE(S) FULL TITLE (INCLUDE BALLOT NO. OR LETTER)	CANDIDATE(S) OFFICE SOUGHT OR HELD OR MEASURE(S) JURISDICTION (INCLUDE DISTRICT NO., CITY OR COUNTY, AS APPLICABLE)	CHECK ONE	
		SUPPORT	OPPOSE
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

**Statement of Organization
Recipient Committee**

INSTRUCTIONS ON REVERSE

CALIFORNIA FORM 410
Page 3
I.D. NUMBER

COMMITTEE NAME
Corso For Council 2014

4. Type of Committee (Continued)

General Purpose Committee

Not formed to support or oppose specific candidates or measures in a single election. Check only one box:

- CITY Committee COUNTY Committee STATE Committee

PROVIDE BRIEF DESCRIPTION OF ACTIVITY

Sponsored Committee

List additional sponsors on an attachment.

NAME OF SPONSOR

INDUSTRY GROUP OR AFFILIATION OF SPONSOR

STREET ADDRESS

NO. AND STREET

CITY

STATE

ZIP CODE

Small Contributor Committee

_____ / _____ / _____
Date qualified

5. Termination Requirements

By signing the verification, the treasurer, assistant treasurer and/or candidate, officeholder, or proponent certify that all of the following conditions have been met:

- This committee has ceased to receive contributions and make expenditures;
- This committee does not anticipate receiving contributions or making expenditures in the future;
- This committee has eliminated or has no intention or ability to discharge all debts, loans received, and other obligations;
- This committee has no surplus funds; and
- This committee has filed all campaign statements required by the Political Reform Act disclosing all reportable transactions.
 - There are restrictions on the disposition of surplus campaign funds held by elected officers who are leaving office and by defeated candidates. Refer to Government Code Section 89519.
 - Leftover funds of ballot measure committees may be used for political, legislative or governmental purposes under Government Code Sections 89511 - 89518, and are subject to Elections Code Section 18680 and FPPC Regulation 18521.5.

Exhibit A-13

RECEIVED

MAR 29 2013

Date Stamp

CALIFORNIA FORM 410

For Official Use Only

2013 MAR 28 AM 9:07

REC'D S.D. CO. ROY

RECEIVED in the office of the State of the Si MAR 18 2013 DEBRA BOWEN

Statement of Organization Recipient Committee

Statement Type

Initial

Not yet qualified or

Amendment

List I.D. number:

1338881

OCEANSIDE CITY CLERK Termination See Part 5

List I.D. number:

#

Date qualified as committee

Date qualified as committee (if applicable)

Date of Termination

1. Committee Information

NAME OF COMMITTEE

Taxpayers for Oceanside Neighborhoods

STREET ADDRESS (NO P.O. BOX)

5838 Ranchview Rd (760) 758-7330

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside CA 92057

MAILING ADDRESS (IF DIFFERENT)

danacorso@sbcglobal.net

FAX / E-MAIL ADDRESS

COUNTY OF DOMICILE

JURISDICTION WHERE COMMITTEE IS ACTIVE

San Diego

2. Treasurer and Other Principal Officers

NAME OF TREASURER

Dana Corso

STREET ADDRESS (NO P.O. BOX)

5838 Ranchview (760) 758-7330

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside CA 92057

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

NAME OF PRINCIPAL OFFICER(S)

Dana Corso President

STREET ADDRESS (NO P.O. BOX)

5838 Ranchview Oside 92057

CITY STATE ZIP CODE AREA CODE/PHONE

(760) 758-7330

Attach additional information on appropriately labeled continuation sheets.

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on

DATE

1-1-13

By

SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Dana Corso

Executed on

DATE

SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on

DATE

SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on

DATE

SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

**Statement of Organization
Recipient Committee**

INSTRUCTIONS ON REVERSE

COMMITTEE NAME
Taxpayers for Oceanside Neighborhoods

- All committees must list the financial institution where the campaign bank account is located.

NAME OF FINANCIAL INSTITUTION Union Bank	AREA CODE/PHONE (800)238-4486	BANK ACCOUNT NUMBER [REDACTED]
ADDRESS 400 California Street	CITY San Francisco	STATE ZIP CODE CA 94104

4. Type of Committee Complete the applicable sections.

Controlled Committee

- List the name of each controlling officeholder, candidate, or state measure proponent. If candidate or officeholder controlled, also list the elective office sought or held, and district number, if any, and the year of the election.
- List the political party with which each officeholder or candidate is affiliated or check "nonpartisan."
- If this committee acts jointly with another controlled committee, list the name and identification number of the other controlled committee.

NAME OF CANDIDATE/OFFICEHOLDER/STATE MEASURE PROPONENT	ELECTIVE OFFICE SOUGHT OR HELD (INCLUDE DISTRICT NUMBER IF APPLICABLE)	YEAR OF ELECTION	PARTY
			<input type="checkbox"/> Nonpartisan
			<input type="checkbox"/> Nonpartisan

Primarily Formed Committee

Primarily formed to support or oppose specific candidates or measures in a single election. List below:

CANDIDATE(S) NAME OR MEASURE(S) FULL TITLE (INCLUDE BALLOT NO. OR LETTER)	CANDIDATE(S) OFFICE SOUGHT OR HELD OR MEASURE(S) JURISDICTION (INCLUDE DISTRICT NO., CITY OR COUNTY, AS APPLICABLE)	CHECK ONE	
		SUPPORT	OPPOSE
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

**Statement of Organization
Recipient Committee**

INSTRUCTIONS ON REVERSE

**CALIFORNIA
FORM 410**

Page 3

I.D. NUMBER
1338881

COMMITTEE NAME

Taxpayers for Oceanside Neighborhoods

4. Type of Committee (Continued)

General Purpose Committee

Not formed to support or oppose specific candidates or measures in a single election. Check only one box:

CITY Committee COUNTY Committee STATE Committee

PROVIDE BRIEF DESCRIPTION OF ACTIVITY

Education Neighborhoods on Community issues.

Sponsored Committee

List additional sponsors on an attachment.

NAME OF SPONSOR

INDUSTRY GROUP OR AFFILIATION OF SPONSOR

STREET ADDRESS

NO. AND STREET

CITY

STATE

ZIP CODE

Small Contributor Committee

_____/_____/_____
Date qualified

5. Termination Requirements

By signing the verification, the treasurer, assistant treasurer and/or candidate, officeholder, or proponent certify that all of the following conditions have been met:

- This committee has ceased to receive contributions and make expenditures;
- This committee does not anticipate receiving contributions or making expenditures in the future;
- This committee has eliminated or has no intention or ability to discharge all debts, loans received, and other obligations;
- This committee has no surplus funds; and
- This committee has filed all campaign statements required by the Political Reform Act disclosing all reportable transactions.
 - There are restrictions on the disposition of surplus campaign funds held by elected officers who are leaving office and by defeated candidates. Refer to Government Code Section 89519.
 - Leftover funds of ballot measure committees may be used for political, legislative or governmental purposes under Government Code Sections 89511 - 89518, and are subject to Elections Code Section 18680 and FPPC Regulation 18521.5.

Exhibit A-14

**Recipient Committee
Campaign Statement
Cover Page**
(Government Code Sections 84200-84216.5)

Type or print in Ink.

*FAXED
MATERIAL*

COVER PAGE

Date Stamp

CALIFORNIA
FORM

460

Page 1 of 15

For Official Use Only

03/31/2014 PM 1:00:20
10/08/2014 16:14 FAX

Statement covers period
from 7-1-14
through 9-30-14

Date of election if applicable:
(Month, Day, Year)
11-4-14

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|--|--|
| <input type="checkbox"/> Officerholder, Candidate Controlled Committee | <input type="checkbox"/> Primarily Formed Ballot Measure Committee |
| <input type="radio"/> State Candidate Election Committee | <input type="radio"/> Controlled |
| <input type="radio"/> Recall
<small>(Also Complete Part 5)</small> | <input type="radio"/> Sponsored
<small>(Also Complete Part 6)</small> |
| <input type="checkbox"/> General Purpose Committee | <input type="checkbox"/> Primarily Formed Candidate/Officerholder Committee
<small>(Also Complete Part 7)</small> |
| <input type="radio"/> Sponsored | |
| <input type="radio"/> Small Contributor Committee | |
| <input type="radio"/> Political Party/Central Committee | |

2. Type of Statement:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<small>(Also file a Form 410 Termination)</small> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER 1368687

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Corso For Council 2014

STREET ADDRESS (NO P.O. BOX)

5838 Ranch View Rd (586)805

CITY STATE ZIP CODE AREA CODE/PHONE
Oceanside, Ca 92057 7777

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Dana Corso

MAILING ADDRESS

5838 Ranch View

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside, Ca 92057

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10-4-14
Date

By Dana Corso
Signature of Treasurer or Assistant Treasurer

Executed on _____
Date

By _____
Signature of Controlling Officerholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officerholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officerholder, Candidate, State Measure Proponent

**Recipient Committee
Campaign Statement
Cover Page — Part 2**

Type or print in Ink.

COVER PAGE - PART 2

CALIFORNIA FORM	460
Page <u>2</u> of <u>15</u>	

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE
Dana Corso

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Oceanside City Council

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: *List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or make expenditures on behalf of your candidacy.*

COMMITTEE NAME <u>Corso For Council 2014</u>	I.D. NUMBER <u>1368687</u>
---	-------------------------------

NAME OF TREASURER <u>Dana Corso</u>	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
--	---

COMMITTEE ADDRESS <u>5838 Ranch View Rd</u>	STREET ADDRESS (NO P.O. BOX) <u>(586) 805-</u>
CITY <u>Oceanside</u>	STATE <u>Ca</u>
ZIP CODE <u>92057</u>	AREA CODE/PHONE <u>7777</u>

COMMITTEE NAME	I.D. NUMBER
----------------	-------------

NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
-------------------	---

COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)
-------------------	------------------------------

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

6. Primarily Formed Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
----------------------	--------------	---

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD	DISTRICT NO. IF ANY
-----------------------	---------------------

7. Primarily Formed Candidate/Officeholder Committee *List names of officeholder(s) or candidate(s) for which this committee is primarily formed.*

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

Attach continuation sheets if necessary

Campaign Disclosure Statement Summary Page

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460 Page <u>3</u> of <u>15</u> I.D. NUMBER <u>1368687</u>
---	--

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Conso For Council 2014

Contributions Received

	Column A TOTAL THIS PERIOD FROM ATTACHED SCHEDULES	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>18,068.00</u>	\$ _____
2. Loans Received Schedule B, Line 3	\$ <u>0</u>	\$ _____
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>18,068.00</u>	\$ _____
4. Nonmonetary Contributions Schedule C, Line 3	\$ <u>0</u>	\$ _____
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>18,068.00</u>	\$ _____

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections

	7/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A	Column B
6. Payments Made Schedule E, Line 4	\$ <u>10,071.04</u>	\$ _____
7. Loans Made Schedule H, Line 3	\$ <u>0</u>	\$ _____
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>10,071.04</u>	\$ _____
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	\$ <u>0</u>	\$ _____
10. Nonmonetary Adjustment Schedule C, Line 3	\$ <u>0</u>	\$ _____
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>10,071.04</u>	\$ _____

Expenditure Limit Summary for State Candidates

22. Cumulative Expenditures Made*
(If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
<u>7/1/14</u>	\$ _____
<u>9/30/14</u>	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>0</u>
13. Cash Receipts Column A, Line 3 above	\$ <u>18,068.00</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	\$ <u>0</u>
15. Cash Payments Column A, Line 8 above	\$ <u>10,071.04</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>6,186.74</u>

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2 \$ 0

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ <u>0</u>
19. Outstanding Debts Add Line 2 + Line 8 in Column B above	\$ <u>0</u>

**Schedule A (Continuation Sheet)
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460
	Page <u>4</u> of <u>15</u>
I.D. NUMBER <u>1368687</u>	

Conso For Council 2014

NAME OF FILER

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
8-14-14	Charles W. McVay ^{SPC 148} 200 N El Camino Real Osido, Ca 92058	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	150.00		
8-17-14	Bob Markley ^{SPC} 200 N. El Camino REAL 138 Osido, Ca 92058	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	600.00		
8-17-14	James Wood 4016 Via Los Padres Oceanside, Ca 92057	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Mayor City of Osido	250.00		
8-17-14	Dick + Carol Blom 3030-71 Oceanside Blvd Osido, Ca 92054	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	500.00		
8-17-14	Gary Lawrence 3421 Caseras Dr Osido, Ca 92056	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Pennysaver graphic artist	500.00		
SUBTOTAL \$				<u>2000.00</u>		

*Contributor Codes
 IND - Individual
 COM - Recipient Committee
 (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

**Schedule A
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period
from 7-1-14
through 9-30-14

CALIFORNIA FORM **460**

Page 5 of 15

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Conso For Council 2014

LD. NUMBER
1368687

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER LD. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
8-28-14	Sharon Clark 222 Blue Springs Ln Oside, Ca 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	100. Retired	100. ⁰⁰		
8-28-14	Joan Brubaker 1406 Hackamore Oceanside, Ca 92057	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	250. ⁰⁰		
8-28-14 8-28-14	William Bruinsma 2882 Dartmouth M. Oside, Ca 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100. ⁰⁰		
8-28-14	Sack Holmes 362 Alpine Oceanside, Ca 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	200. ⁰⁰		
8-28-14	Sane Gilligan 6407 La Paloma Oside, Ca 92057	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	'	100. ⁰⁰		
SUBTOTAL \$				<u>750.⁰⁰</u>		

Schedule A Summary

- Amount received this period - itemized monetary contributions.
(Include all Schedule A subtotals.) \$ 17,600.⁰⁰
- Amount received this period - unitemized monetary contributions of less than \$100 \$ 468.⁰⁰
- Total monetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.) **TOTAL \$** 18,068.⁰⁰

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

**Schedule A
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period from _____ through _____	CALIFORNIA FORM 460
	Page <u>6</u> of <u>15</u>
	I.D. NUMBER <u>13682687</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Conso For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
9-10-14	Golden State Manufactured home owners League 200 N. El Camino Real Oside, Ca 92058	<input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		500.00		
9-2-14	Diane Hanson 131 200 N. El Camino Real Oside, Ca 92058	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.00		
8-30-14	Kathleen Dyer 372 200 N. El Camino Real Oside, Ca 92058	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.00		
8-22-14	Doris Becker 181 200 N. El Camino Real Oside, Ca 92058	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	200.00		
9-25-14	Golden State Manufact 200 N. El Camino Real Oside, Ca 92058	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		250.00		
SUBTOTALS				<u>1150.00</u>		

Schedule A Summary

- Amount received this period - itemized monetary contributions.
(Include all Schedule A subtotals.) \$ _____
- Amount received this period - unitemized monetary contributions of less than \$100 \$ _____
- Total monetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.) **TOTAL** \$ _____

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

**Schedule A (Continuation Sheet)
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period from _____ through _____	CALIFORNIA FORM 460 Page <u>7</u> of <u>15</u> I.D. NUMBER <u>131,9687</u>
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NAME OF FILER
Consolid For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
9-18-14	Erin P. Gilligan-Morin 1241 Chamboard CT Oside, 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Admin Assistant Edwin A. Tomlin 6467 wa Paloma oside, Ca 92057	200. ⁰⁰		
9-18-14	Carol Blom 3030 71 Oside Blvd Oceanside, Ca 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	200. ⁰⁰		
9-22-14	Rancho Calevera HOA Ginger mayer Treasurer 137 Skyline Lane oside 92052	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		400. ⁰⁰		
9-26-14	Oceanside Manu. Home Assoc P.O. Box 642 San Luis Rey, Ca 92068	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		3000. ⁰⁰		
9-13-14	Pala Band of Mission 35008 Pala Terrecula Pala, Ca 92059	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		5000. ⁰⁰		
SUBTOTAL \$				8800.⁰⁰		

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

**Schedule A (Continuation Sheet)
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period from _____ through _____	CALIFORNIA FORM 460 Page <u>8</u> of <u>15</u> I.D. NUMBER <u>1368687</u>
--	--

NAME OF FILER

Corso For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
9-25-14	Osido City Employees Assoc P.O. Box 852 Osido, Ca 92049	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		2500. ⁰⁰		
9-25-14	California Teamsters 1127 11th Street Ste 512 Sacramento, Ca 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		2500. ⁰⁰		
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
				SUBTOTAL \$ 5000. ⁰⁰		

*Contributor Codes

- IND - Individual
- COM - Recipient Committee
(other than PTY or SCC)
- OTH - Other (e.g., business entity)
- PTY - Political Party
- SCC - Small Contributor Committee

**Schedule E
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULEE

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460
	Page <u>9</u> of <u>15</u>
	I.D. NUMBER <u>1368687</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Consd For Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MEM member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHD phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
<u>City of Oceanside</u>	<u>Fil</u>	<u>Ballot Statement</u>	<u>1000.</u>
<u>Registrar of Voters</u>	<u>CMP</u>	<u>Voters list</u>	<u>155.28</u>
<u>Hadler Williams + Purdy</u> <u>(760) 754-4150</u>	<u>OFC</u>	<u>Insurance</u>	<u>305.60</u>

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 1460.88

Schedule E Summary

- | | |
|--|---------------------------|
| 1. Itemized payments made this period. (Include all Schedule E subtotals.) | \$ <u>10,071.04</u> |
| 2. Unitemized payments made this period of under \$100 | \$ _____ |
| 3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).) | \$ _____ |
| 4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.) | TOTAL \$ <u>10,071.04</u> |

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460 Page <u>10</u> of <u>15</u>
	I.D. NUMBER <u>13681087</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Corso For Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP campaign paraphernalia/misc.	MBR member communications	RAD radio airtime and production costs
CNS campaign consultants	MTG meetings and appearances	RFD returned contributions
CTB contribution (explain nonmonetary)*	OFC office expenses	SAL campaign workers' salaries
CVC civic donations	PET petition circulating	TEL T.V. or cable airtime and production costs
FL candidate filing/ballot fees	PHD phone banks	TRC candidate travel, lodging, and meals
FND fundraising events	POL polling and survey research	TRS staff/spouse travel, lodging, and meals
IND independent expenditure supporting/opposing others (explain)*	POS postage, delivery and messenger services	TSF transfer between committees of the same candidate/sponsor
LEG legal defense	PRO professional services (legal, accounting)	VOT voter registration
LIT campaign literature and mailings	PRT print ads	WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Registrar of Voters (800) 725-1243	CMP	Precinct map	46.09
Fry's Electronics San Marcos	OFC	Supplies	70.19
Wacky Button 402 935 7735	OFC	Buttons	168.55
Copy Max Vista, Ca	OFC	Copies (literature)	325.50
Verizon Wireless Elcaminio, Oceanside	Pho	Phone Banko	225.00

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 835.33

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Curso For Council 2014

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460 Page <u>11</u> of <u>15</u> I.D. NUMBER <u>1368687</u>
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CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MEM member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Verizon Wireless El Cerrito, CA	Pho	Phone Bank	90.00
Fry's Electronics San Marcos	CMP	Camp Misc.	483.97
Fry's Electronics San Marcos	CMP	ink	70.19
99 Store 1030 Oceanside, CA	Cmp	Folders, paper supplies	48.13
North County Printers Oceanside, CA	Cmp	Signs	667.98
SUBTOTAL \$			1360.27

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460
	Page <u>12</u> of <u>15</u>
	I.D. NUMBER <u>1368687</u>

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Corsd For Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MEB member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POE polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Halter, Williams + Purdy (760) 754-4150	OFC	Insurance	305.60
Copy Max Vista, Ca	OMP	Copies	271.25
Home Depot Oceanside, Ca	OMP	Posts & Supplies For signs	44.32
Copy Max Vista, Ca	OMP	Copies	84.07
Walman & Oceanside, Ca	OFC	Supplies	22.24
SUBTOTAL \$			727.48

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460
	Page <u>13</u> of <u>15</u>
	I.D. NUMBER <u>1368687</u>

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Curso for Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP campaign paraphernalia/misc.	MBR member communications	RAD radio airtime and production costs
CNS campaign consultants	MTG meetings and appearances	RFD returned contributions
CTB contribution (explain nonmonetary)*	OFC office expenses	SAL campaign workers' salaries
CVC civic donations	PET petition circulating	TEL tv. or cable airtime and production costs
FL candidate filing/ballot fees	PHD phone banks	TRC candidate travel, lodging, and meals
FND fundraising events	POL polling and survey research	TRS staff/spouse travel, lodging, and meals
IND independent expenditure supporting/opposing others (explain)*	POS postage, delivery and messenger services	TSF transfer between committees of the same candidate/sponsor
LEG legal defense	PRO professional services (legal, accounting)	VOT voter registration
LIT campaign literature and mailings	PRT print ads	WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Calif. Voter Guide 1954 W. Carson Street Torrance, Ca 90501	Lit	mailer	1511.00
Calif. Voter guide 936 Colorado Blvd L.A. Ca 90041	Lit	mailer	350.00
North County Printers Osido, Ca	Cmp	Signs	1960.20
KOCT, Oceanside Taping	Rad	Taping	200.00
Plavidian 2210 E. Vista Way Vista, Ca 92084	Cmp	Walk piece	1054.62
SUBTOTAL \$			5075.82

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in Ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460
	Page <u>14</u> of <u>15</u>
	LD. NUMBER <u>1368687</u>

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Corso For Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MER member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | REF returned contributions |
| CTB contributions (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER LD. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Copy max Vista, Ca	emp Lit	copies	199.64
msft microsoft software	ofc emp	office Expense	99.00
Placidian Dollar Tree Store 3861 Mission Ave oside	ofc	office Expense	8.61
att Vista Village Dr.	Pho	office Expense	108.50
Staples 2150 Vista Way oside, Ca 92054	ofc	office Expense	20.51

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 436.26

08:31:36 P.M. 10-06-2014 14
10/08/2014 16:18 FAX

014

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-1-14</u> through <u>9-30-14</u>	CALIFORNIA FORM 460
	Page <u>15</u> of <u>15</u>
	I.D. NUMBER <u>1368687</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Corso For Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FE candidate filing/initial fees | PHD phone banks | TFC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSE transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
<u>Ken Tius Printing Vista, Ca 92082</u>	<u>cmp</u>	<u>Remittance envelopes</u>	<u>175.⁰⁰</u>

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 175.⁰⁰

Exhibit A-15

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Type or print in Ink.

COVER PAGE

Date Stamp	CALIFORNIA FORM 460
RECEIVED JUL 15 2015 OCEANSIDE CITY CLERK	Page _____ of _____ For Official Use Only

Statement covers period from <u>7/1/14</u> through <u>9/30/14</u>	Date of election if applicable: (Month, Day, Year) <u>11/4/14</u>
---	---

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Officeholder, Candidate Controlled Committee
<input type="checkbox"/> State Candidate Election Committee
<input type="checkbox"/> Recall
<i>(Also Complete Part 5)</i> | <input type="checkbox"/> Primarily Formed Ballot Measure Committee
<input type="checkbox"/> Controlled
<input type="checkbox"/> Sponsored
<i>(Also Complete Part 6)</i> |
| <input type="checkbox"/> General Purpose Committee
<input type="checkbox"/> Sponsored
<input type="checkbox"/> Small Contributor Committee
<input type="checkbox"/> Political Party/Central Committee | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee
<i>(Also Complete Part 7)</i> |

2. Type of Statement:

- | | |
|---|---|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<i>(Also file a Form 410 Termination)</i> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input checked="" type="checkbox"/> Amendment (Explain below) | |
- To include non monetary contribution for office space _____

3. Committee Information

I.D. NUMBER
1368687

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Corso For Council 2014

STREET ADDRESS (NO P.O. BOX)

5838 Ranch View Rd

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Oceanside</u>	<u>CA</u>		<u>5868057777</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Dana Corso

MAILING ADDRESS

5838 Ranch View Rd

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Oceanside</u>	<u>CA</u>		<u>5868057777</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 7-13-15
Date

Executed on _____
Date

Executed on _____
Date

Executed on _____
Date

By Dana Corso
Signature of Treasurer or Assistant Treasurer

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Recipient Committee
Campaign Statement
Cover Page — Part 2**

Type or print in ink.

COVER PAGE - PART 2

CALIFORNIA FORM **460**

Page _____ of _____

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE

Dana Corso

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)

Oceanside City Council

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: *List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or make expenditures on behalf of your candidacy.*

COMMITTEENAME Corso For Council 2014	I.D. NUMBER
---	-------------

NAME OF TREASURER Dana Corso	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
---------------------------------	---

COMMITTEE ADDRESS 5838 Ranch View	STREET ADDRESS (NO P.O. BOX)		
CITY Oceanside	STATE CA	ZIP CODE 92057	AREA CODE/PHONE 5868057777

COMMITTEENAME	I.D. NUMBER
---------------	-------------

NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
-------------------	---

COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)		
CITY	STATE	ZIP CODE	AREA CODE/PHONE

6. Primarily Formed Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
----------------------	--------------	---

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD	DISTRICT NO. IF ANY
-----------------------	---------------------

7. Primarily Formed Candidate/Officeholder Committee *List names of officeholder(s) or candidate(s) for which this committee is primarily formed.*

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
-----------------------------------	-----------------------	---

Attach continuation sheets if necessary

**Campaign Disclosure Statement
Summary Page**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>7/1/14</u>	CALIFORNIA FORM 460
through <u>9/30/14</u>	
Page _____ of _____	I.D. NUMBER 1368687

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Corso For Council 2014

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ 18,168.00	\$ 18,168.00
2. Loans Received Schedule B, Line 3	0	0
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ 18,168.00	\$ 18,168.00
4. Nonmonetary Contributions Schedule C, Line 3	1000.00	1000.00
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ 19,168.00	\$ 19,168.00

**Calendar Year Summary for Candidates
Running in Both the State Primary and
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ 10,071.00	\$ 10,071.04
7. Loans Made Schedule H, Line 3	0	0
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ 10,071.00	\$ 10,071.00
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	0	0
10. Nonmonetary Adjustment Schedule C, Line 3	1000.00	1000.00
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ 11,071.00	\$ 11,071.00

**Expenditure Limit Summary for State
Candidates**

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)	
Date of Election (mm/dd/yy)	Total to Date
____/____/____	\$ _____
____/____/____	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ 0
13. Cash Receipts Column A, Line 3 above	18,168.00
14. Miscellaneous Increases to Cash Schedule I, Line 4	0
15. Cash Payments Column A, Line 8 above	10,071.00
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ 8096.96

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2 \$ 0

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ 0
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ 0

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

**Schedule C
Nonmonetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE C

Statement covers period from <u>7/1/14</u> through <u>9/30/14</u>	CALIFORNIA FORM 460
Page _____ of _____	I.D. NUMBER 1368687

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Corso For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	AMOUNT/ FAIR MARKET VALUE	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
	Oceanside Associates 3825 Mission Avenue Oceanside, CA 92054	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		Office Space	1000.00	9/1/14-11/15/1	1000.00
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$ 1000.001

Schedule C Summary

- Amount received this period – itemized nonmonetary contributions.
(Include all Schedule C subtotals.) \$ 1000.00
- Amount received this period – unitemized nonmonetary contributions of less than \$100 \$ _____
- Total nonmonetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 10.) **TOTAL \$ 1000.00**

***Contributor Codes**
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other (e.g., business entity)
PTY – Political Party
SCC – Small Contributor Committee

Exhibit A-16

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE

Date Stamp RECEIVED OCT 27 2014 OCEANSIDE CITY CLERK	CALIFORNIA 2001/02 FORM 460
	Page <u>1</u> of <u>6</u>
	For Official Use Only

Statement covers period from <u>10-1-14</u> through <u>10-22-14</u>	Date of election if applicable: (Month, Day, Year) <u>11-4-14</u>
---	---

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|--|---|
| <input checked="" type="checkbox"/> Officeholder, Candidate Controlled Committee | <input type="checkbox"/> Ballot Measure Committee |
| <input type="checkbox"/> State Candidate Election Committee | <input type="checkbox"/> Primarily Formed |
| <input type="checkbox"/> Recall
<small>(Also Complete Part 5)</small> | <input type="checkbox"/> Controlled |
| <input type="checkbox"/> General Purpose Committee | <input type="checkbox"/> Sponsored
<small>(Also Complete Part 6)</small> |
| <input type="checkbox"/> Sponsored | <input type="checkbox"/> Primarily Formed Candidate/
Officeholder Committee
<small>(Also Complete Part 7)</small> |
| <input type="checkbox"/> Small Contributor Committee | |
| <input type="checkbox"/> Political Party/Central Committee | |

2. Type of Statement:

- | | |
|--|--|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement | <input type="checkbox"/> Supplemental Preelection
Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER 1368687

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Corso For Council 2014

STREET ADDRESS (NO P.O. BOX)

5838 Ranch View Rd (586) 805-7777

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside Ca 92057

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Dana Corso

MAILING ADDRESS

5838 Ranch View Rd

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside, Ca 92057

NAME OF ASSISTANT TREASURER, IF ANY

(586) 805-7777

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10-22-14
Date

By Dana Corso
Signature of Treasurer or Assistant Treasurer

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Recipient Committee
Campaign Statement
Cover Page — Part 2**

Type or print in ink.

COVER PAGE - PART 2

CALIFORNIA FORM **460**

Page 2 of 6

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE
Dana Corso

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Oceanside City Council

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: *List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or make expenditures on behalf of your candidacy.*

COMMITTEE NAME <u>Corso For Council 26M</u>	I.D. NUMBER <u>1368687</u>
NAME OF TREASURER <u>Dana Corso</u>	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
COMMITTEE ADDRESS <u>5838 Ranch View Rd</u>	STREET ADDRESS (NO P.O. BOX)
CITY <u>Oceanside Ca</u>	STATE ZIP CODE AREA CODE/PHONE <u>92057 (586) 805-7777</u>
COMMITTEE NAME	I.D. NUMBER
NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)
CITY	STATE ZIP CODE AREA CODE/PHONE

6. Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
----------------------	--------------	---

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD	DISTRICT NO. IF ANY
-----------------------	---------------------

7. Primarily Formed Committee *List names of officeholder(s) or candidate(s) for which this committee is primarily formed.*

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE

Attach continuation sheets if necessary

Campaign Disclosure Statement Summary Page

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>10-1-14</u> through <u>10-22-14</u>	CALIFORNIA FORM 460 Page <u>3</u> of <u>6</u>
I.D. NUMBER <u>1368687</u>	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Conso for Council 2014

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>1320.00</u>	\$ <u>19,388.00</u>
2. Loans Received Schedule B, Line 3	\$ <u>0</u>	\$ <u>0</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>1320.00</u>	\$ <u>19,388.00</u>
4. Nonmonetary Contributions Schedule C, Line 3	\$ <u>0</u>	\$ <u>0</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>1320.00</u>	\$ <u>19,388.00</u>

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ <u>5399.62</u>	\$ <u>15,470.66</u>
7. Loans Made Schedule H, Line 3	\$ <u>0</u>	\$ _____
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>5399.62</u>	\$ <u>15,470.66</u>
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	\$ <u>0</u>	\$ _____
10. Nonmonetary Adjustment Schedule C, Line 3	\$ <u>0</u>	\$ _____
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>5399.62</u>	\$ <u>15,470.66</u>

Expenditure Limit Summary for State Candidates

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)	
Date of Election (mm/dd/yy)	Total to Date
____/____/____	\$ _____
____/____/____	\$ _____
____/____/____	\$ _____
____/____/____	\$ _____
____/____/____	\$ _____
____/____/____	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>6,186.74</u>
13. Cash Receipts Column A, Line 3 above	<u>1320.00</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	<u>0</u>
15. Cash Payments Column A, Line 8 above	<u>5399.62</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>2107.12</u>

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Since January 1, 2001. Amounts in this section may be different from amounts reported in Column B.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2	\$ <u>0</u>
---	-------------

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ <u>0</u>
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ <u>0</u>

**Schedule A
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period
from 10-1-14
through 10-22-14

CALIFORNIA FORM 460

Page 4 of 4

I.D. NUMBER
1368687

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Corso For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
10-1-14	Tony Persinger 165 Horizon Lane Oside, Ca 92056	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.00		
10-1-14	Carol + Dick Blom 3636 Oside Blvd # 71 Oside, Ca 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	500.00		
10-2-14	Mangot Lowe 4834 Northwely Street Oceanside, Ca 92056	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.00		
10-6-14	George Mcneil 2153 Andra Lucia Way Oside, Ca 92057	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.00		
10-17-14	W.E. LITTLE 3201 mesa Dr Oside, Ca 92054	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.00		

SUBTOTAL \$ 900.00

Schedule A Summary

- Amount received this period – contributions of \$100 or more.
(Include all Schedule A subtotals.) \$ 1100.00
- Amount received this period – unitemized contributions of less than \$100 \$ 220.00
- Total monetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.) **TOTAL \$** 1320.00

*Contributor Codes
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other
PTY – Political Party
SCC – Small Contributor Committee

**Schedule A (Continuation Sheet)
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period from _____ through _____	CALIFORNIA FORM 460
	Page <u>5</u> of <u>4</u>
I.D. NUMBER <u>1368687</u>	

NAME OF FILER

Conso For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
10-21-14	Sacqui Hart 1619 th Harlamore Oceanside, Ca 92056	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Self	100.		
10-17-14	Willie Little 3201 Misa Dr. OSide, Ca 92057	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	100.		
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
SUBTOTAL \$				<u>200.00</u>		

*Contributor Codes
 IND - Individual
 COM - Recipient Committee
 (other than PTY or SCC)
 OTH - Other
 PTY - Political Party
 SCC - Small Contributor Committee

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in Ink
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>1-1-14</u> through <u>5-10-14</u>	CALIFORNIA FORM 460 Page <u>1</u> of <u>1</u>
L.D. NUMBER 1368687	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Consd for Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP campaign paraphernalia/misc.	MER member communications	RAD radio airtime and production costs
CMS campaign consultants	MTG meetings and appearances	RFD returned contributions
CTB contribution (explain nonmonetary)*	OFC office expenses	SAL campaign workers' salaries
CVC civic donations	PET petition circulating	TEL t.v. or table airtime and production costs
FL candidate filing/ballot fees	PHD phone banks	TRC candidate travel, lodging, and meals
FND fundraising events	POL polling and survey research	TFS staff/spouse travel, lodging, and meals
IND independent expenditure supporting/opposing others (explain)*	POS postage, delivery and messenger services	TSF transfer between committees of the same candidate/sponsor
LEG legal defense	PRO professional services (legal, accounting)	VOT voter registration
LIT campaign literature and mailings	PRF print ads	WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER L.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Copy max 1914 Hacienda Vista, Ca 92081	emp Lit	copies of literature	4027.81
Coast news 315 South Coast Hwy Ste W Encinitas, Ca 92024	OFC EMP	office Expense	1030.00
Dollar Tree Store 3861 Mission Ave OSide	OFC	office Expense	23.52
Verizon Wireless 3760 Mission Ocean 92054	PHD PHD	office Expense office Expense	275.00
Staples 2150 Vista Way OSide, Ca 92054	OFC	office Expense	44.10

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 5399.62

Exhibit A-17

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE

Date Stamp RECEIVED MAY 11 2015 OCEANSIDE CITY CLERK	CALIFORNIA FORM 460
	Page <u>1</u> of <u>5</u> For Official Use Only

Statement covers period from <u>10-23-14</u> through <u>12-31-14</u>	Date of election if applicable: (Month, Day, Year) <u>11-4-14</u>
--	---

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Officeholder, Candidate Controlled Committee
<input type="checkbox"/> State Candidate Election Committee
<input type="checkbox"/> Recall
<small>(Also Complete Part 5)</small> | <input type="checkbox"/> Primarily Formed Ballot Measure Committee
<input type="checkbox"/> Controlled
<input type="checkbox"/> Sponsored
<small>(Also Complete Part 6)</small> |
| <input type="checkbox"/> General Purpose Committee
<input type="checkbox"/> Sponsored
<input type="checkbox"/> Small Contributor Committee
<input type="checkbox"/> Political Party/Central Committee | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee
<small>(Also Complete Part 7)</small> |

2. Type of Statement:

- | | |
|---|---|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input checked="" type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<small>(Also file a Form 410 Termination)</small> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER 1368687

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Corso For Council 2014

STREET ADDRESS (NO P.O. BOX)

5838 Ranch View Rd

CITY Oceanside STATE Ca ZIP CODE 92057 AREA CODE/PHONE (586) 805

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

7777

CITY _____ STATE _____ ZIP CODE _____ AREA CODE/PHONE _____

OPTIONAL: FAX / E-MAIL ADDRESS _____

Treasurer(s)

NAME OF TREASURER

Dana Corso

MAILING ADDRESS

5838 Ranch View

CITY _____ STATE _____ ZIP CODE _____ AREA CODE/PHONE _____

Oceanside, Ca 92057

NAME OF ASSISTANT TREASURER, IF ANY

(586) 805-7777

MAILING ADDRESS

CITY _____ STATE _____ ZIP CODE _____ AREA CODE/PHONE _____

OPTIONAL: FAX / E-MAIL ADDRESS _____

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 5-8-15
Date

By Dana Corso
Signature of Treasurer or Assistant Treasurer

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Campaign Disclosure Statement Summary Page

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period
from 10-23-14
through 12-31-14

CALIFORNIA
FORM **460**

Page 2 of 5

I.D. NUMBER
1368687

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Corso For Council 2014

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>0</u>	\$ <u>19,388.00</u>
2. Loans Received Schedule B, Line 3	<u>3000.00</u>	<u>3000.00</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>3000.00</u>	\$ <u>22,388.00</u>
4. Nonmonetary Contributions Schedule C, Line 3	<u>0</u>	<u>0</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>3000.00</u>	\$ <u>22,388.00</u>

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ <u>6722.80</u>	\$ <u>22,194.27</u>
7. Loans Made Schedule H, Line 3	<u>0</u>	<u>0</u>
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>6722.80</u>	\$ <u>22,194.27</u>
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	<u>0</u>	<u>0</u>
10. Nonmonetary Adjustment Schedule C, Line 3	<u>0</u>	<u>0</u>
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>6722.80</u>	\$ <u>22,194.27</u>

Expenditure Limit Summary for State Candidates

22. Cumulative Expenditures Made*
(If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
<u>1/1/14</u>	\$ _____
<u>1/1/14</u>	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>3916.53</u>
13. Cash Receipts Column A, Line 3 above	<u>3000.00</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	<u>0</u>
15. Cash Payments Column A, Line 8 above	<u>6722.80</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>193.73</u>

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2 \$ _____

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ _____
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ _____

**Schedule B - Part 1
Loans Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period
from 10-23-14
through 12-31-14

CALIFORNIA
FORM **460**

Page 3 of 5

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Corso For Council 2014

I.D. NUMBER
1368687

FULL NAME, STREET ADDRESS AND ZIP CODE OF LENDER (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT RECEIVED THIS PERIOD	(c) AMOUNT PAID OR FORGIVEN THIS PERIOD*		(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST PAID THIS PERIOD	(f) ORIGINAL AMOUNT OF LOAN	(g) CUMULATIVE CONTRIBUTIONS TO DATE
				<input type="checkbox"/> PAID	<input type="checkbox"/> FORGIVEN				
<u>Dana Corso</u> <u>5438 Ranch View</u> <u>Oceanside, Ca 92057</u> † <input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	<u>Self-employed</u> <u>Gucci Poochies</u>	\$ _____	\$ <u>3000.00</u>	\$ _____	\$ _____	\$ _____	_____% RATE	\$ _____	\$ _____ PER ELECTION**
† <input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$ _____	\$ _____	\$ _____	\$ _____	\$ _____	_____% RATE	\$ _____	\$ _____ PER ELECTION**
† <input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$ _____	\$ _____	\$ _____	\$ _____	\$ _____	_____% RATE	\$ _____	\$ _____ PER ELECTION**
SUBTOTALS \$		\$ _____	\$ _____	\$ _____	\$ _____	\$ _____		\$ _____	

(Enter (e) on Schedule E, Line 3)

Schedule B Summary

- Loans received this period \$ 3000.00
(Total Column (b) plus unitemized loans of less than \$100.)
- Loans paid or forgiven this period \$ 0
(Total Column (c) plus loans under \$100 paid or forgiven.)
(Include loans paid by a third party that are also itemized on Schedule A.)
- Net change this period. (Subtract Line 2 from Line 1.) NET \$ 3000.00
Enter the net here and on the Summary Page, Column A, Line 2.
(May be a negative number)

†Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

*Amounts forgiven or paid by another party also must be reported on Schedule A.
** If required.

**Schedule E
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>10-23-14</u> through <u>12-31-14</u>	CALIFORNIA FORM 460
	Page <u>4</u> of <u>5</u>
	I.D. NUMBER <u>1368687</u>

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Conso For Council 2014

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- CMP campaign paraphernalia/misc.
- CNS campaign consultants
- CTB contribution (explain nonmonetary)*
- CVC civic donations
- FIL candidate filing/ballot fees
- FND fundraising events
- IND independent expenditure supporting/opposing others (explain)*
- LEG legal defense
- LIT campaign literature and mailings

- MBR member communications
- MTG meetings and appearances
- OFC office expenses
- PET petition circulating
- PHO phone banks
- POL polling and survey research
- POS postage, delivery and messenger services
- PRO professional services (legal, accounting)
- PRT print ads

- RAD radio airtime and production costs
- RFD returned contributions
- SAL campaign workers' salaries
- TEL t.v. or cable airtime and production costs
- TRC candidate travel, lodging, and meals
- TRS staff/spouse travel, lodging, and meals
- TSF transfer between committees of the same candidate/sponsor
- VOT voter registration
- WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Union Tribune P.O. Box 120191 San Diego, Ca 92112-0191	PRT	Ad in Paper	1084.24
		Sticker on front Page	586.00
Copy max 1914 Hacienda, Vista, Ca 92081	LIT	mailer	3433.57
Hatter, Williams & Purdy 2232 Faraday, Carlsbad, Ca	OFC	Insurance (2nd payment)	305.60
SUBTOTAL \$			5409.41

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

Schedule E Summary

1. Itemized payments made this period. (Include all Schedule E subtotals.)	\$ <u>6346.69</u>
2. Unitemized payments made this period of under \$100	\$ <u>376.11</u>
3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).)	\$ <u>0</u>
4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.)	TOTAL \$ <u>6722.80</u>

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period
from 10-23-14
through 12-31-14

CALIFORNIA FORM **460**

Page 5 of 5

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Corso For Council 2014

I.D. NUMBER
1368687

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- CMP campaign paraphernalia/misc.
- CNS campaign consultants
- CTB contribution (explain nonmonetary)*
- CVC civic donations
- FIL candidate filing/ballot fees
- FND fundraising events
- IND independent expenditure supporting/opposing others (explain)*
- LEG legal defense
- LIT campaign literature and mailings

- MBR member communications
- MTG meetings and appearances
- OFC office expenses
- PET petition circulating
- PHO phone banks
- POL polling and survey research
- POS postage, delivery and messenger services
- PRO professional services (legal, accounting)
- PRT print ads

- RAD radio airtime and production costs
- RFD returned contributions
- SAL campaign workers' salaries
- TEL t.v. or cable airtime and production costs
- TRC candidate travel, lodging, and meals
- TRS staff/spouse travel, lodging, and meals
- TSF transfer between committees of the same candidate/sponsor
- VOT voter registration
- WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Verizon Wireless El Camino Real Oside, Ca 92052	Pho	Phone banks	130.00
Lowery For Council 2014 (1367346) P.O. Box 950 Oceanside, Ca 92049	Pol	Robo call (For both)	300.00
Fry's - 150 Bent Ave San Marcos, Ca 92069	OFC	Equipment	433.83
Walmart College, Oceanside	CMP	Ink & paper supplies	73.45

SUBTOTAL \$ 937.28

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

Exhibit A-18

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE

Date Stamp RECEIVED MAR 27 2014 OCEANSIDE CITY CLERK	CALIFORNIA FORM 460
	Page <u>1</u> of <u>4</u>
	For Official Use Only

Statement covers period from <u>7-1-2013</u> through <u>12-31-2013</u>	Date of election if applicable: (Month, Day, Year) _____
--	--

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|--|--|
| <input type="checkbox"/> Officeholder, Candidate Controlled Committee
<input type="radio"/> State Candidate Election Committee
<input type="radio"/> Recall
<small>(Also Complete Part 5)</small> | <input type="checkbox"/> Primarily Formed Ballot Measure Committee
<input type="radio"/> Controlled
<input type="radio"/> Sponsored
<small>(Also Complete Part 6)</small> |
| <input checked="" type="checkbox"/> General Purpose Committee
<input type="radio"/> Sponsored
<input type="radio"/> Small Contributor Committee
<input type="radio"/> Political Party/Central Committee | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee
<small>(Also Complete Part 7)</small> |

2. Type of Statement:

- | | |
|---|---|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input checked="" type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<small>(Also file a Form 410 Termination)</small> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

TaxPAYERS For Oceanside Neighborhoods

STREET ADDRESS (NO P.O. BOX)

5838 Ranchview RD

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside, Ca 92057 (586) 805-7777

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Dana Corso

MAILING ADDRESS

5838 Ranchview

CITY STATE ZIP CODE AREA CODE/PHONE

Oceanside, Ca 92057 (586) 805-7777

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 3-17-14
Date

By Dana Corso
Signature of Treasurer or Assistant Treasurer

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Campaign Disclosure Statement
Summary Page**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>7-1-13</u>	CALIFORNIA FORM 460
through <u>12-31-13</u>	
Page <u>2</u> of <u>4</u>	
I.D. NUMBER <u>1338881</u>	

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

TAXPAYERS For OCEANSIDE NEIGHBORHOODS

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>321.02</u>	\$ <u>18,021.52</u>
2. Loans Received Schedule B, Line 3	\$ <u>0</u>	\$ <u>0</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>321.02</u>	\$ <u>18,021.52</u>
4. Nonmonetary Contributions Schedule C, Line 3	\$ <u>0</u>	\$ <u>0</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>321.02</u>	\$ <u>18,021.52</u>

**Calendar Year Summary for Candidates
Running in Both the State Primary and
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ <u>513.67</u>	\$ <u>43,056.76</u>
7. Loans Made Schedule H, Line 3	\$ <u>0</u>	\$ <u>0</u>
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>513.67</u>	\$ <u>43,056.76</u>
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	\$ <u>0</u>	\$ <u>0</u>
10. Nonmonetary Adjustment Schedule C, Line 3	\$ _____	\$ _____
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>513.67</u>	\$ <u>43,056.76</u>

**Expenditure Limit Summary for State
Candidates**

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)	
Date of Election (mm/dd/yy)	Total to Date
<u>1/1</u>	\$ _____
<u>1/1</u>	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>291.59</u>
13. Cash Receipts Column A, Line 3 above	<u>321.02</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	<u>0</u>
15. Cash Payments Column A, Line 8 above	<u>513.67</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>98.94</u>

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2	\$ _____
---	----------

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ _____
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ _____

**Schedule E
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULEE

Statement covers period from <u>7-1-2013</u> through <u>12-31-2013</u>	CALIFORNIA FORM 460
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1338881</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|--|--|--|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND Independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
<u>Blu Host</u> <u>1958 South 950</u> <u>LTA 4 (888) 401-4478</u>	<u>WEB</u>	<u>WEBSITE HOSTING</u>	<u>236.15</u> <u>11.99</u>
<u>USPS - AVENIDA DE LA PLATA</u> <u>475 LENFANT PI</u> <u>WASH. DC (714) 274 3100</u>	<u>POS</u>	<u>P.O. BOX</u>	<u>39.00</u>
<u>CA Secretary of STATE</u> <u>1500 11th ST (916) 653-3775</u>	<u>FIL</u>	<u>Filing Fee</u>	<u>20.00</u>

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$

Schedule E Summary

- | | |
|--|-------------------------------|
| 1. Itemized payments made this period. (Include all Schedule E subtotals.) | \$ _____ |
| 2. Unitemized payments made this period of under \$100 | \$ _____ |
| 3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).) | \$ _____ |
| 4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.) | TOTAL \$ <u>513.67</u> |

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-1-2013</u>	CALIFORNIA FORM 460
through <u>12-31-2013</u>	
Page <u>4</u> of <u>4</u>	I.D. NUMBER <u>1338881</u>

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Fly's Electronics San Marcos, Ca	OFC	INK FOR COPY MACHINE	69.06
Fry's ELECTRONICS SAN MARCOS, Ca	OFC	INK	59.94
POSTAL ANNEX COLLEGE + 74 Oceanside, Ca 92057	LIT OFC	Literature	11.48
Costco Vista, CA	MTG	MEETING Supplies	59. 56.93
DOLLAR TREE 1090 E. VISTA WAY VISTA, CA	OFC	OFFICE Supplies	9.12

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$

**Recipient Committee
Campaign Statement
Cover Page**
(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE

Date Stamp
RECEIVED
OCT 27 2014
OCEANSIDE CITY CLERK

CALIFORNIA FORM **460**
Page 1 of 3
For Official Use Only

Statement covers period
from 1-1-14
through 6-30-14
Date of election if applicable:
(Month, Day, Year)

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
- State Candidate Election Committee
- Recall
(Also Complete Part 5)
- General Purpose Committee
 - Sponsored
 - Small Contributor Committee
 - Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
 - Controlled
 - Sponsored
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- Preelection Statement
- Semi-annual Statement
- Termination Statement
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER 133 8881

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Taxpayers For Oside Neighborhoods

STREET ADDRESS (NO P.O. BOX)

5838 Ranchview Rd

CITY

Oside, Ca 92057

STATE ZIP CODE

AREA CODE/PHONE

(586) 805-7777

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY

STATE ZIP CODE

AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Sana Corso

MAILING ADDRESS

5838 Ranchview Rd

CITY

Oside, Ca 92057

STATE ZIP CODE

AREA CODE/PHONE

(586) 805-7777

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY

STATE ZIP CODE

AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ Date

Executed on _____ Date

Executed on _____ Date

Executed on _____ Date

By Sana Corso Signature of Treasurer or Assistant Treasurer

By _____ Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

By _____ Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____ Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Campaign Disclosure Statement
Summary Page**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>1-1-14</u> through <u>7-30-14</u>	CALIFORNIA FORM 460 Page <u>2</u> of <u>3</u>
	I.D. NUMBER <u>133 8881</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

TAXPAYERS For Oceanside Neighborhoods

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>491.00</u>	\$ <u>18,512.52</u>
2. Loans Received Schedule B, Line 3	\$ <u>0</u>	\$ <u>0</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>491.00</u>	\$ <u>18,512.52</u>
4. Nonmonetary Contributions Schedule C, Line 3	\$ <u>0</u>	\$ <u>0</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>491.00</u>	\$ <u>18,512.52</u>

**Calendar Year Summary for Candidates
Running in Both the State Primary and
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ <u>466.94</u>	\$ <u>43,523.70</u>
7. Loans Made Schedule H, Line 3	\$ <u>0</u>	\$ <u>0</u>
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>466.94</u>	\$ <u>43,523.70</u>
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	\$ <u>0</u>	\$ <u>0</u>
10. Nonmonetary Adjustment Schedule C, Line 3	\$ _____	\$ _____
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>466.94</u>	\$ <u>43,523.70</u>

**Expenditure Limit Summary for State
Candidates**

22. Cumulative Expenditures Made*
(If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
<u>1/1</u>	\$ _____
<u>1/1</u>	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>98.94</u>
13. Cash Receipts Column A, Line 3 above	\$ <u>491.00</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	\$ <u>0</u>
15. Cash Payments Column A, Line 8 above	\$ <u>466.94</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>123.00</u>

If this is a termination statement, Line 16 must be zero.

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2 \$ _____

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ _____
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ _____

**Schedule E
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E

Statement covers period from <u>1-1-14</u>	CALIFORNIA FORM 460
through <u>to 30-14</u>	Page <u>3</u> of <u>3</u>
I.D. NUMBER	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP campaign paraphernalia/misc.	MBR member communications	RAD radio airtime and production costs
CNS campaign consultants	MTG meetings and appearances	RFD returned contributions
CTB contribution (explain nonmonetary)*	OFC office expenses	SAL campaign workers' salaries
CVC civic donations	PET petition circulating	TEL t.v. or cable airtime and production costs
FIL candidate filing/ballot fees	PHO phone banks	TRC candidate travel, lodging, and meals
FND fundraising events	POL polling and survey research	TRS staff/spouse travel, lodging, and meals
IND independent expenditure supporting/opposing others (explain)*	POS postage, delivery and messenger services	TSF transfer between committees of the same candidate/sponsor
LEG legal defense	PRO professional services (legal, accounting)	VOT voter registration
LIT campaign literature and mailings	PRT print ads	WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Blu ACTION 1958 South Street, ^{STE} 950	CMP WEB	Website	19.99
USPS 475 LENFANT 8884014678 ^{SLC, WITH} Avenida del Oro, Occidental, Ca 92034	CMP	P.O. BOX	39.00
Rite Aid	CMP	Supplies	29.41
Plavidian Printing	CMP	Supplies	368.90
Dollar Tree 1090 1090 E. VISTA WAY, Vista	CMP	Supplies	9.64

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 466.94

Schedule E Summary

1. Itemized payments made this period. (Include all Schedule E subtotals.)	\$ <u>466.94</u>
2. Unitemized payments made this period of under \$100	\$ _____
3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).)	\$ _____
4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.)	TOTAL \$ <u>466.94</u>

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE

Date Stamp RECEIVED MAY 11 2015 OCEANSIDE CITY CLERK	CALIFORNIA FORM 460 Page <u>1</u> of <u>5</u> For Official Use Only
--	--

Statement covers period from <u>7-30-14</u> through <u>12-31-14</u>	Date of election if applicable: (Month, Day, Year) _____
---	--

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|--|---|
| <input type="checkbox"/> Officeholder, Candidate Controlled Committee | <input type="checkbox"/> Primarily Formed Ballot Measure Committee |
| <input type="checkbox"/> State Candidate Election Committee | <input type="checkbox"/> Controlled |
| <input type="checkbox"/> Recall
<small>(Also Complete Part 5)</small> | <input type="checkbox"/> Sponsored
<small>(Also Complete Part 6)</small> |
| <input checked="" type="checkbox"/> General Purpose Committee | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee
<small>(Also Complete Part 7)</small> |
| <input type="checkbox"/> Sponsored | |
| <input type="checkbox"/> Small Contributor Committee | |
| <input type="checkbox"/> Political Party/Central Committee | |

2. Type of Statement:

- | | |
|---|---|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input checked="" type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<small>(Also file a Form 410 Termination)</small> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER 1338881

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS

STREET ADDRESS (NO P.O. BOX)
5838 Ranch View

CITY STATE ZIP CODE AREA CODE/PHONE
Oceanside Ca 92057 (586) 805-7777

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER
Dana CORSO

MAILING ADDRESS
5838 Ranch View Rd

CITY STATE ZIP CODE AREA CODE/PHONE
Oceanside, Ca 92057

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 5-8-15
Date

By Dana CORSO
Signature of Treasurer or Assistant Treasurer

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Campaign Disclosure Statement
Summary Page**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>7-30-14</u>	CALIFORNIA FORM 460
through <u>12-31-14</u>	
Page <u>2</u> of <u>5</u>	I.D. NUMBER

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>1176.22</u>	\$ <u>1667.22</u>
2. Loans Received Schedule B, Line 3	\$ <u>0</u>	\$ <u>0</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>1176.22</u>	\$ <u>1667.22</u>
4. Nonmonetary Contributions Schedule C, Line 3	\$ <u>0</u>	\$ <u>0</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>1176.22</u>	\$ <u>1667.22</u>

**Calendar Year Summary for Candidates
Running in Both the State Primary and
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ <u>760.30</u>	\$ <u>1227.24</u>
7. Loans Made Schedule H, Line 3	\$ <u>0</u>	\$ <u>0</u>
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>760.30</u>	\$ <u>1227.24</u>
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	\$ <u>0</u>	\$ <u>0</u>
10. Nonmonetary Adjustment Schedule C, Line 3	\$ <u>0</u>	\$ <u>0</u>
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>760.30</u>	\$ <u>1227.24</u>

**Expenditure Limit Summary for State
Candidates**

22. Cumulative Expenditures Made*
(If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
____/____/____	\$ _____
____/____/____	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>123.00</u>
13. Cash Receipts Column A, Line 3 above	<u>1176.22</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	<u>0</u>
15. Cash Payments Column A, Line 8 above	<u>760.30</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>538.92</u>

If this is a termination statement, Line 16 must be zero.

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2	\$ _____
---	----------

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ _____
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ _____

**Schedule A
Monetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period
from 7-30-14
through 12-31-14

CALIFORNIA FORM **460**

Page 3 of 5

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS

I.D. NUMBER

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
10-13-14	JAMES WOOD 4014 LOS PADRES OSIDE, CA 92057	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		200. ⁰⁰		
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				

SUBTOTAL \$

Schedule A Summary

- Amount received this period – itemized monetary contributions.
(Include all Schedule A subtotals.) \$ 200.00
- Amount received this period – unitemized monetary contributions of less than \$100 \$ 976.22
- Total monetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.) **TOTAL \$** 1176.22

*Contributor Codes
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other (e.g., business entity)
PTY – Political Party
SCC – Small Contributor Committee

**Schedule E
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period		SCHEDULEE	
from	<u>7-30-14</u>	CALIFORNIA FORM	460
through	<u>12-31-14</u>	Page <u>4</u> of <u>5</u>	
NAME OF FILER			I.D. NUMBER
<u>TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS</u>			

SEE INSTRUCTIONS ON REVERSE

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|--|--|--|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
<u>Dollar Tree 1090 E Vista Way, Vista</u>	<u>CMP</u>	<u>Supplies</u>	<u>27.11</u>

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$

Schedule E Summary

- | | |
|--|-------------------------------|
| 1. Itemized payments made this period. (Include all Schedule E subtotals.) | \$ <u>760.30</u> |
| 2. Unitemized payments made this period of under \$100 | \$ _____ |
| 3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).) | \$ _____ |
| 4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.) | TOTAL \$ <u>760.30</u> |

**Schedule E
(Continuation Sheet)
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from <u>7-30-14</u> through <u>12-31-14</u>	CALIFORNIA FORM 460
	Page <u>5</u> of <u>5</u>
	I.D. NUMBER <u>1338881</u>

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

TAXPAYERS FOR OCEANSIDE NEIGHBORHOODS

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Ken Ries Printing Vista, Ca	OFC	Envelopes	189.88
Costco Hacienda Vista, Ca	CMP	Supplies	110.08
Conso For Council 2014 #1368687	POL	Robo call	300.00
Walmart 705 College, Oceanside	OFC	Supplies	66.72
copy Max 1914 Hacienda, Vista	OFC	Printing	66.51

Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 733.19

Exhibit A-19

1 GALENA WEST
Chief of Enforcement
2 MICHAEL W. HAMILTON
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 322-5772
5 Facsimile: (916) 322-1932

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission
7

8
9 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
10 STATE OF CALIFORNIA

11 In the Matter of) FPPC No. 15/245
12)
13)
14 CORSO FOR COUNCIL 2014,) DECLARATION OF BOB PERNA IN
TAXPAYERS FOR OCEANSIDE) SUPPORT OF DEFAULT DECISION AND
15 NEIGHBORHOODS, and DANA CORSO,) ORDER
16)
) (Gov. Code §§ 11506 and 11520)
17 Respondents.)

18 I, Bob Perna, declare as follows:

- 19 1. I am over the age of 18 years and not a party to the within action. My business address is
20 1102 Q Street, Suite 3000, Sacramento, California.
- 21 2. I am a Program Specialist for the Enforcement Division of the Fair Political Practices Commission
22 (the "Commission") and have worked for the Commission from April 15, 1991 to November 4, 2014 and
23 from October 6, 2015 to the present.
- 24 3. On July 11, 2017, I interviewed Dana Corso via telephone regarding the campaign activities of the
25 Corso for Council 2014 (ID #1368687) committee and the Taxpayers for Oceanside Neighborhoods (ID
26 #1338881) committee.
- 27
28

1 4. In the interview Corso told me told me the following regarding her experience with the running
2 for office and the Political Reform Act (PRA):

3 a. Prior to her campaign for City Council in 2012 she had never been a candidate for elective
4 office or held a public elective office.

5 b. She has only been a treasurer for her 2012 city council campaign committee, her 2014 city
6 council campaign committee, and Taxpayers for Oceanside Neighborhoods committee.

7 c. She does not have a formal financial or accounting background.

8 d. She owns a business and does the financial work for her business and manages her own
9 personal finances.

10 e. She has not read the Political Reform Act (Act).

11 f. She does not recall reading any of the campaign disclosure manuals.

12 g. She has not attended any training classes on the Act.

13 h. She has spoken to the Oceanside City Clerk's Office and emailed the Fair Political
14 Practices Commission regarding her duties and responsibilities under the Act as either a candidate,
15 treasurer, or principal officer, but could not recall the nature of those conversations or emails.

16 5. In the same interview, Corso told me the following regarding Taxpayers for Oceanside
17 Neighborhoods:

18 a. Taxpayers for Oceanside Neighborhoods has a governing board that consists of five
19 members and she is a member of that board.

20 b. She confirmed that as of January 1, 2013, she has been the President and Treasurer of
21 Taxpayers for Oceanside Neighborhoods.

22 c. Decisions to raise and spend money is made by a vote of the governing board, which meets
23 once per month.

24 d. The last amendment to Taxpayers for Oceanside Neighborhood's statement of organization
25 was on January 1, 2013, which added Corso as the treasurer and president of the committee. There have
26 been no changes to report since that date.

1 6. On January 28, 2020, I reviewed the filings of Taxpayers for Oceanside Neighborhoods and
2 verified that Corso did not file pre-election campaign statements for the November 4, 2014, City Council
3 Election.

4 7. I reviewed the FTB audit report for the Corso for Council 2014 committee and it explained that
5 Corso made a \$200 cash contribution to the campaign. The \$200 deposit was not disclosed on the
6 campaign statement filed for the period ending on September 30, 2014. Corso filed an amendment for this
7 statement on July 15, 2015 but failed to report this contribution.

8 8. In July 2015, the July 1, 2014 – September 30, 2014 campaign statement, was amended to add a
9 non-monetary contribution for office space from Oceanside Associates that was not reported. During the
10 audit of the committee conducted by FTB, the auditor spoke with Corso about the office space and FTB
11 obtained from Corso a copy of a lease agreement for the office space. The lease agreement covered the
12 period of September 1, 2014 – November 15, 2014. The lease agreement shows the monthly rent as \$1.
13 Corso told the FTB auditor she estimated the fair market value of the office space by researching the rental
14 prices of similar properties around that time. There was nothing in the lease that showed the FMV of the
15 monthly rent. FTB accepted Corso's estimate of the value. Based on the estimated FMV the reported non-
16 monetary contribution of \$1,000 for the period September 1, 2014 – September 30, 2014 is accurate.

17 9. In July 2015, an amended statement was filed for the period ending on December 31, 2014, it
18 added two non-monetary contributions for office space from Oceanside Associates. A \$1,000
19 nonmonetary contribution was reported as received on October 20, 2014 and a \$1,000 non-monetary
20 contribution was reported as received on November 20, 2014. Based on the FMV of the donated offices
21 space, the statement should report a non-monetary contribution of \$919 for the statement period. (\$419
22 for prorated portion of October and \$500 for November through the 15th of the month when the lease
23 terminated.

24 10. The total non-monetary contribution for the office space reported on the July 2015 amended
25 statements for the periods ending September 30, 2014 and December 31, 2014 was \$3,000. The total non-
26 monetary contributions for the office space for the period of September 1, 2014 – November 15, 2014 was
27 \$2,500 based on FMV.

1 11. A form 497 contribution report was not filed for the donated offices space from Oceanside
2 Associates with an FMV of \$1,000 for the month of September 2014. The date for receiving cumulative
3 contributions totaling \$1,000 was September 30, 2014.

4 12. A Form 497 contribution report was not filed for donated offices space from Oceanside Associates
5 with an FMV of \$1,000 for the month of October 2014. The date for receiving cumulative contributions
6 totaling \$1,000 was October 31, 2014.

7 13. Corso for Council over-reported the loans she made to the campaign by \$2,010. FTB determined
8 Corso loaned her campaign \$990 instead of the \$3,000 she reported. FTB determined there was no
9 transactions that matched Corso's reported amount.

10 14. A Form 497 Contribution Report was not filed for cumulative contributions totaling \$1,000 from
11 Bernard D. Blom received during the 90-day period before the 11/04/14 election. The committee received
12 a \$500 contribution from Bernard D. Blom on 08/17/14 and a \$500 contribution from Bernard D. Blom
13 on 10/01/14.

14 I declare under penalty of perjury under the laws of the State of California, that the foregoing is
15 true and correct.

16 Dated: March 4, 2020

Bob Perna
Bob Perna
Program Specialist, Enforcement Division
Fair Political Practices Commission

Exhibit A-20

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE

Date Stamp RECEIVED JUL 15 2015 OCEANSIDE CITY CLERK	CALIFORNIA FORM 460
Page _____ of _____	
For Official Use Only	

Statement covers period from <u>10/23/14</u> through <u>12/31/14</u>	Date of election if applicable: (Month, Day, Year) <u>11/4/14</u>
---	--

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|--|---|
| <input checked="" type="checkbox"/> Officeholder, Candidate Controlled Committee | <input type="checkbox"/> Primarily Formed Ballot Measure Committee |
| <input type="checkbox"/> State Candidate Election Committee | <input type="checkbox"/> Controlled |
| <input type="checkbox"/> Recall
<i>(Also Complete Part 5)</i> | <input type="checkbox"/> Sponsored
<i>(Also Complete Part 6)</i> |
| <input type="checkbox"/> General Purpose Committee | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee
<i>(Also Complete Part 7)</i> |
| <input type="checkbox"/> Sponsored | |
| <input type="checkbox"/> Small Contributor Committee | |
| <input type="checkbox"/> Political Party/Central Committee | |

2. Type of Statement:

- | | |
|---|---|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<i>(Also file a Form 410 Termination)</i> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input checked="" type="checkbox"/> Amendment (Explain below) | |
- To include non monetary contribution for office space _____

3. Committee Information

I.D. NUMBER
1368687

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Corso For Council 2014

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Oceanside	CA		5868057777

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Dana Corso

MAILING ADDRESS

	STATE	ZIP CODE	AREA CODE/PHONE
Oceanside	CA		5868057777

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 7-13-15
Date

Executed on _____
Date

Executed on _____
Date

Executed on _____
Date

By Dana Corso
Signature of Treasurer or Assistant Treasurer

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Recipient Committee
Campaign Statement
Cover Page — Part 2**

Type or print in ink.

COVER PAGE - PART 2

CALIFORNIA
FORM **460**

Page _____ of _____

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE
Dana Corso

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Oceanside City Council

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: *List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or make expenditures on behalf of your candidacy.*

COMMITTEE NAME Corso For Council 2014	I.D. NUMBER
NAME OF TREASURER Dana Corso	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO

COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)		
CITY	STATE	ZIP CODE	AREA CODE/PHONE
Oceanside	CA	92057	5868057777

COMMITTEE NAME	I.D. NUMBER		
NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO		
COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)		

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

6. Primarily Formed Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
----------------------	--------------	---

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD	DISTRICT NO. IF ANY
-----------------------	---------------------

7. Primarily Formed Candidate/Officeholder Committee *List names of officeholder(s) or candidate(s) for which this committee is primarily formed.*

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE

Attach continuation sheets if necessary

**Campaign Disclosure Statement
Summary Page**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>10/23/14</u>	CALIFORNIA FORM 460
through <u>12/31/14</u>	
Page _____ of _____	I.D. NUMBER 1368687

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Corso For Council 2014

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions Schedule A, Line 3	\$ <u>0</u>	\$ <u>19,388.00</u>
2. Loans Received Schedule B, Line 3	<u>3000.00</u>	<u>3000.00</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>3000.00</u>	\$ <u>22,388.00</u>
4. Nonmonetary Contributions Schedule C, Line 3	<u>3000.00</u>	<u>3000.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>6000.00</u>	\$ <u>25,388.00</u>

**Calendar Year Summary for Candidates
Running in Both the State Primary and
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

Expenditures Made

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made Schedule E, Line 4	\$ <u>6722.80</u>	\$ <u>22,194.27</u>
7. Loans Made Schedule H, Line 3	<u>0</u>	<u>0</u>
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>6722.80</u>	\$ <u>22,194.27</u>
9. Accrued Expenses (Unpaid Bills) Schedule F, Line 3	<u>0</u>	<u>0</u>
10. Nonmonetary Adjustment Schedule C, Line 3	<u>2000.00</u>	<u>3000.00</u>
11. TOTAL EXPENDITURES MADE Add Lines 8 + 9 + 10	\$ <u>8722.80</u>	\$ <u>25,194.27</u>

**Expenditure Limit Summary for State
Candidates**

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)	
Date of Election (mm/dd/yy)	Total to Date
____/____/____	\$ _____
____/____/____	\$ _____

Current Cash Statement

12. Beginning Cash Balance Previous Summary Page, Line 16	\$ <u>3916.53</u>
13. Cash Receipts Column A, Line 3 above	<u>3000.00</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	<u>0</u>
15. Cash Payments Column A, Line 8 above	<u>6722.80</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>193.73</u>

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED Schedule B, Part 2	\$ _____
---	----------

Cash Equivalents and Outstanding Debts

18. Cash Equivalents See instructions on reverse	\$ _____
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ _____

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

*Amounts in this section may be different from amounts reported in Column B.

Schedule C
Nonmonetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE C

Statement covers period from <u>10/23/14</u> through <u>12/31/14</u>	CALIFORNIA FORM 460
Page _____ of _____	I.D. NUMBER 1368687

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Corso For Council 2014

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	AMOUNT/ FAIR MARKET VALUE	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
10//2014	Oceanside Associates [REDACTED] Oceanside, CA 92054	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		Office space	1000.00		
11/2014	Oceanside Associates [REDACTED] Oceanside, CA 92054	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		Office Space	1000.00		3000.00
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$

Schedule C Summary

1. Amount received this period – itemized nonmonetary contributions. (Include all Schedule C subtotals.)	\$	2000.00
2. Amount received this period – unitemized nonmonetary contributions of less than \$100	\$	
3. Total nonmonetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 10.)	TOTAL \$	2000.00

*Contributor Codes
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other (e.g., business entity)
PTY – Political Party
SCC – Small Contributor Committee

Exhibit A-21



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3000 • Sacramento, CA 95811

February 5, 2020

Dana Corso
Individually, and o/b/o
Corso for Council 2014
Taxpayers for Oceanside Neighborhoods
5256 South Mission Rd, Suite 310
Bonsall, CA 92003

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC No. 15/245, In the Matter of Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso

Dear Ms. Corso:

On October 10, 2019, you were served with an accusation in the above referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the "Commission") will proceed with a default, decision and order ("default") against you. The initial notice of this default will appear on the published agenda for the Commission's public meeting on February 20, 2020. This agenda will be public, and you could be contacted by the media with questions. The Commission will be asked to adopt the default at the subsequent public meeting on March 19, 2020 and impose an administrative penalty of \$15,500 against you.

Following the issuance of the default, the Commission will obtain a judgment in superior court for the amount owed and then take action to collect the judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

¹ Government Code Section 11505.

You may still resolve this matter informally by way of a stipulated settlement if an agreement can be reached prior to this matter appearing for consideration by the Commission. Please contact me at (916) 322-5772 or mhamilton@fppc.ca.gov if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael W. Hamilton", written over a light blue circular stamp.

Michael W. Hamilton
Commission Counsel
Enforcement Division

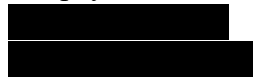
Exhibit A-22



FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

April 1, 2020

Dana Corso
Individually, and o/b/o
Corso for Council 2014
Taxpayers for Oceanside Neighborhoods



Dana Corso
Individually, and o/b/o
Corso for Council 2014
Taxpayers for Oceanside Neighborhoods
1205 Auto Park Way, Suite 204
Escondido, CA 92029

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC No. 15/245, In the Matter of Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso

Dear Ms. Corso:

On October 10, 2019, you were personally served with an accusation in the above referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default appeared on the published agenda for the Commission’s public meeting on **February 20, 2020**. The Commission will be asked to adopt the default at its public meeting scheduled for **April 16, 2020** and impose an administrative penalty of \$15,500 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on April 16, 2020 is enclosed with this letter.

¹ Government Code section 11505.

You may, but you are not required to, provide a response brief, along with any supporting materials, no later than five calendar days before the Commission hearing at which the default is scheduled to be heard. Your response brief must be served on the Commission Assistant, at the above address.

Following the issuance of the default order and imposition of the administrative penalty, we will commence legal proceedings to collect this fine, which may include converting the Commission's order to a court judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

This letter is your last opportunity to resolve this matter informally by way of a stipulated settlement, before the default proceedings are commenced. If we do not reach a resolution, the enclosed documents will be placed on the Commission's agenda for the April 16, 2020 meeting. Please contact me at (916) 322-5772 or mhamilton@fppc.ca.gov if you wish to enter into a negotiated settlement.

Sincerely,

Michael Hamilton

Michael W. Hamilton
Commission Counsel
Enforcement Division

Enclosures