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11
12 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

13 **STATE OF CALIFORNIA**

14 In the Matter of) FPPC No.: 18/1359
15)
16 SANDY GENIS FOR COSTA MESA CITY)
17 COUNCIL 2016, SANDY GENIS FOR)
18 COSTA MESA MAYOR 2018, SANDY)
19 GENIS FOR COSTA MESA MAYOR 2020,)
20 AND SANDY GENIS,)
21) (Government Code Sections 11506
22) and 11520)
23 Respondents.)

24 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
25 submits this Default Decision and Order for consideration by the Fair Political Practices Commission at
26 its next regularly scheduled meeting.

27 Pursuant to the California Administrative Procedure Act,¹ Sandy Genis (“Genis”), Sandy Genis
28 for Costa Mesa City Council 2016 (“the 2016 Committee”), Sandy Genis for Costa Mesa Mayor 2018
29 (“the 2018 Committee”), and Sandy Genis for Costa Mesa Mayor 2020 (“the 2020 Committee”) have
30 been served with all of the documents necessary to conduct an administrative hearing regarding the
31 above-captioned matter, including the following:

1. An Order Finding Probable Cause;

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

2. An Accusation;
3. A Notice of Defense (Two Copies per Respondent);
4. A Statement to Respondent; and
5. Copies of Sections 11506, 11507.5, 11507.6 and 11507.7 of the Government Code.

Government Code Section 11506 provides that failure of a respondent to file a Notice of Defense within fifteen days after being served with an Accusation shall constitute a waiver of respondent's right to a hearing on the merits of the Accusation. The Statement to Respondent, served on Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee, stated that a Notice of Defense must be filed in order to request a hearing. Genis and the committees failed to file a Notice of Defense within fifteen days of being served with an Accusation. Government Code Section 11520 provides that, if the respondent fails to file a Notice of Defense, the Commission may take action, by way of a default, based upon the respondent's express admissions or upon other evidence, and that affidavits may be used as evidence without any notice to the respondent.

Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee violated the Political Reform Act as described in Exhibit 1, which is attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and accurate summary of the law and evidence in this matter. This Default Decision and Order is submitted to the Commission to obtain a final disposition of this matter.

Dated: _____

James M. Lindsay, Chief of Enforcement
Fair Political Practices Commission

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ORDER

The Commission issues this Default Decision and Order and imposes a total administrative penalty of \$68,000 upon Sandy Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee, payable to the “General Fund of the State of California.”

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

Dated: _____

Adam E. Silver, Chair
Fair Political Practices Commission

EXHIBIT 1

INTRODUCTION

Respondent, Sandy Genis (“Genis”) was elected to the Costa Mesa City Council during the November 6, 2012 General Election. Genis was re-elected during the November 8, 2016 General Election and served on the Costa Mesa City Council through 2020.

Sandy Genis for Costa Mesa City Council 2016 (the “2016 Committee”) was Genis’ controlled committee in the 2016 election. Michael Harmanos (“Harmanos”) served as treasurer for the 2016 Committee. Harmanos is not being charged as a respondent in this matter because Harmanos provided documentation indicating he stepped down from his position as treasurer on November 8, 2017.

Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 6, 2018 and November 3, 2020 General Elections. Sandy Genis for Costa Mesa Mayor 2018 (the “2018 Committee”) was Genis’ controlled committee in the 2018 election. Genis for Costa Mesa Mayor 2020 (the “2020 Committee”) was Genis’s candidate-controlled committee for the 2020 election. Genis served as treasurer for both the 2018 and 2020 Committees.

The Political Reform Act (the “Act”)¹ requires recipient committees to timely file and amend a statement of organization, timely file preelection and semi-annual campaign statements and to disclose the total amount of all contributions received, including loans. For contributions of \$100 or more, the campaign statements must provide certain identifying information about the source of a contribution, including the date of the loan.²

This matter stemmed from three filing officer referrals, one from the Secretary of State’s Office (“SOS”) and two from the City of Costa Mesa.

The 2016 Committee and Genis failed to timely file two preelection campaign statements and eight semi-annual campaign statements. The 2018 Committee and Genis failed to timely file two preelection campaign statements and ten semi-annual campaign statements. The 2020 Committee and Genis failed to timely file an amended statement of organization, two preelection campaign statements, failed to report all contributor information on one preelection campaign statement, and failed to timely file seven semi-annual campaign statements.

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 18104 through 18998 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 84211, subs. (a),(c), and (f)(5).

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.³ Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure Act (the “APA”).⁴ 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.⁵

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 certain 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.⁶

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.⁷ 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.⁸

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 starts the administrative action.⁹

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

³ Section 83116.

⁴ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

⁵ Section 11503.

⁶ Section 11506, subd. (a)(1)–(6).

⁷ Section 11506, subd. (c).

⁸ Section 11520, subd. (a).

⁹ Section 91000.5, subd. (a).

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.¹⁰ 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.¹¹

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.¹²

Documents supporting the procedural history are included in the attached Certification of Records (“Certification”) filed herewith at Exhibit 1, A-1 through A-7 and Exhibit A-19 and A-20 and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee in this matter by serving them with a Report in Support of a Finding of Probable Cause (the “Report”) (Certification, Exhibit A-1) by certified mail.¹³ Genis was served with the Report on April 5, 2024 individually and on behalf of the Committees (Certification, Exhibit A-2). The administrative action commenced on April 5, 2024, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee contained a cover letter and a memorandum describing probable cause proceedings that advised they had 21 days in which to request a probable cause conference and/or to file a written response to the Report. Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee did not request a probable cause conference or submit a written response to the Report.

B. Ex Parte Request for a Finding of Probable Cause

Because Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee failed to request a probable cause conference or submit a written response to the Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on June 6, 2024 (Certification, Exhibit A-3).

¹⁰ Section 83115.5.

¹¹ Section 83115.5.

¹² Section 91000.5.

¹³ Section 83115.5.

On June 11, 2024, the Hearing Officer, Legal Division, Karen Harrison, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee (Certification, Exhibit A-4).

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

¹⁴ Regulation 18361.4, subd. (g).

¹⁵ Section 11505, subd. (a).

¹⁶ Section 11505, subd. (b).

¹⁷ Section 11505, subd. (c).

On June 28, 2024, the Commission’s Chief of Enforcement, James M. Lindsay, issued an Accusation against Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee (Certification, Exhibit A-5). 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 Genis, the 2016 Committee, the 2018 Committee and the 2022 Committee by personal service on July 8, 2024 (Certification, Exhibit A-6).

Along with the Accusation, the Enforcement Division served Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee 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-7). Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee did not file a Notice of Defense within the statutory time period, which ended on July 23, 2024.

As a result, on October 1, 2024, the Enforcement Division sent a letter to Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for November 21, 2024 (Certification, Exhibit A-19).

On October 24, 2024, the Enforcement Division sent another letter to Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for November 21, 2024 (Certification, Exhibit A-20). 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 discussion below regarding jurisdiction, the standard for finding probable cause, and the contents of the probable cause report includes references to current law. Unless otherwise noted, all other legal references and discussions of law pertain to the Act’s provisions as they existed at the time of the violations in this case.

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 that support or oppose them, to disclose all contributions and expenditures made throughout a campaign.¹⁸ Along these lines, the Act includes a comprehensive campaign reporting system.¹⁹

A recipient committee shall file a statement of organization within 10 days after the committee has qualified as a committee and report the committee’s date of qualification. The

¹⁸ Section 81002, subd. (a).

¹⁹ Section 84200, *et seq.*

Secretary of State (“SOS”) shall assign a number to each committee that files a statement of organization and shall notify the committee of the number.²⁰ If there is a change in any of the information contained in a statement of organization, an amendment shall be filed within 10 days to reflect the change.²¹ The committee must file the original of the amendment with the SOS and a copy with the local filing officer.²²

At the core of the Act’s campaign reporting system is the requirement that candidates and committees must file campaign statements and reports for certain periods and by certain deadlines. The Act requires candidates and their controlled committees to file campaign statements at specific times disclosing information regarding contributions received and expenditures made by the campaign committees.²³

Whenever the Act requires that a statement or report be filed prior to or not later than a specified date, and the deadline 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.²⁴ This extension does not apply to 24-hour contribution reports when the due date falls on a Saturday, Sunday, or official state holiday immediately prior to an election.²⁵

All candidates appearing on the ballot to be voted on at the next election, their controlled committees, and committees primarily formed to support or oppose an elected officer, candidate, or a measure appearing on the ballot to be voted on at the next election shall file the applicable preelection statements specified in Section 84200.8.²⁶

Applicable preelection campaign statements shall be filed as follows: (1) for the period ending 45 days before the election, the statement shall be filed no later than 40 days before the election, and (2) for the period ending 17 days before the election the statement shall be filed no later than 12 days before the election.²⁷

Recipient committees shall file semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31 if they have made contributions or independent expenditures, including payments to a slate mailer organization, during the six-month period before the closing date of the statements.²⁸

A committee must also disclose on campaign statements the total amount of all contributions received, including loans. For contributions of \$100 or more, the statements must

²⁰ Section 84101, subd. (a).

²¹ Section 84103, subd. (a).

²² Sections 84103, subd. (a); and 84215.

²³ Section 84200, *et seq.*

²⁴ Section 81005, subd. (a) [effective 2019]; Regulation 18116, subd. (a) [2018].

²⁵ Section 81005, subd. (b)(1) [effective 2019]; Regulation 18116, subd. (b)(1) [2018].

²⁶ Section 84200.5, subd. (a).

²⁷ Section 84200.8, subd. (a)-(b).

²⁸ Section 84200 (a).

provide certain identifying information about the source of a contribution, including the date of the loan.²⁹

It is the duty of a committee's treasurer, including a candidate who is acting as the committee treasurer, to ensure that the committee complies with all the requirements of the Act.³⁰ A committee's treasurer may be held jointly and severally liable, along with the candidate and committee, for violations committed by the committee.³¹

SUMMARY OF THE EVIDENCE

Documents supporting the summary of the evidence are included in the attached Certification of Records ("Certification") filed herewith as Certified, Exhibit 1, A-8 through A-18, and incorporated herein by reference.

Genis and the 2016 Committee

Genis successfully ran for Costa Mesa City Council in the November 8, 2016 General Election. The 2016 Committee was Genis's candidate-controlled committee for the 2016 election cycle. On February 9, 2015, the 2016 Committee filed an amendment to its statement of organization with SOS to re-designate Genis' candidate-controlled committee from the 2012 election to the 2016 Committee in preparation for the 2016 General Election (Certification, Exhibit A-8). During the 2016 General Election, the 2016 Committee raised approximately \$15,015 in contributions and spent approximately \$13,652 in expenditures (Certification, Exhibit A-9).

Genis and the 2016 Committee failed to timely file the semi-annual campaign statement covering the period of July 1, 2019 to December 31, 2019, filing 11 days late (Certification, Exhibit A-10). The next required campaign statement, covering the period of January 1, 2020 to June 30, 2020 was timely filed (Certification, Exhibit A-11). However, Genis and the 2016 Committee had failed to file any subsequent campaign statements with the Costa Mesa City Clerk. To date, the 2016 Committee remains open and continues to have a filing obligation. The following chart summarizes the 2016 Committee's late campaign statements.

Statement/Type	Reporting Period	Due Date	Date Filed
Semi-annual	7/1/2019 – 12/31/2019	1/31/2020	2/11/2020
Preelection ³²	7/1/2020 – 9/19/2020	9/24/2020	Not Filed

²⁹ Section 84211, subs. (a), (c) and (f)(5).

³⁰ Sections 81004, 84100, and 84104 and Regulation 18427.

³¹ Sections 83116.5 and 91006 and Regulation 18316.6.

³² Since Genis was a candidate for Mayor on the November 3, 2020 General Election ballot, the 2016 Committee, Genis, and Harmanos were required to file the first pre-election campaign statement with the City Clerk by the September 24, 2020 deadline.

Preelection ³³	9/20/2020 – 10/17/2020	10/22/2020	Not Filed
Semi-annual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
Semi-annual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
Semi-annual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
Semi-annual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semi-annual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semi-annual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semi-annual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

Genis and the 2018 Committee

Genis unsuccessfully ran for Costa Mesa Mayor in the November 6, 2018 General Election. The 2018 Committee was Genis’ candidate-controlled committee for the 2018 election cycle. Genis served as the treasurer of the 2020 Committee.

As a candidate on the ballot in the November 6, 2018 General Election, Genis and the 2018 Committee were required to file preelection campaign statements. Genis and the 2018 Committee timely filed both preelection campaign statements (Certification, Exhibit A-12). However, Genis and the 2018 Committee failed to timely file many subsequent campaign statements.

The campaign statement covering the period of January 1, 2019 to June 30, 2019 was filed on August 6, 2019 (Certification, Exhibit A-13). Genis and the 2018 Committee also failed to timely file the next semi-annual campaign statement covering the period of July 1, 2019 to December 31, 2019, filing on February 11, 2020 (Certification, Exhibit A-14). Genis and the 2018 Committee timely filed the next semi-annual campaign statement covering the period of January 1, 2020 to June 30, 2020 (Certification, Exhibit A-15). Genis and the 2018 Committee failed to timely file any subsequent campaign statements, despite remaining open and continuing to have filing obligations. Below is a chart summarizing the 2018 Committee’s late campaign statements.

Statement/Type	Reporting Period	Due Date	Date Filed
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³³ Since Genis was a candidate for Mayor on the November 3, 2020 General Election ballot, the 2016 Committee, Genis, and Harmanos were required to file the second pre-election campaign statement with the City Clerk by the October 22, 2020 deadline.

Semi-annual	1/1/2019 – 6/30/2019	7/31/2019	8/6/2019
Semi-annual	7/1/2019 – 12/31/2019	1/31/2020	2/11/2019
Preelection ³⁴	7/1/2020 – 9/19/2020	9/24/2020	Not Filed
Preelection ³⁵	9/20/2020 – 10/17/2020	10/22/2020	Not Filed
Semi-annual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
Semi-annual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
Semi-annual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
Semi-annual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semi-annual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semi-annual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semi-annual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

Genis and the 2020 Committee

Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 3, 2020 General Election. The 2020 Committee was Genis’ candidate-controlled committee for the 2020 election cycle. The 2020 Committee filed an initial statement of organization with the SOS on August 24, 2020, which indicated it had not yet qualified and that Genis served as the treasurer (Certification, A-16). Genis was a candidate for Mayor on the November 3, 2020 General Election ballot; therefore, Genis and the 2020 Committee were required to file preelection campaign statements with the City Clerk by the September 24, 2020 and October 22, 2020 deadlines.

Genis and the 2020 Committee late-filed the first preelection campaign statement on September 28, 2020 and reported \$6,763.99 in contributions and \$933.73 in expenditures (Certification, Exhibit A-17). According to the campaign statement, the Committee qualified on or around September 15, 2020 (Certification, Exhibit A-17). Within 10 days of qualifying, Genis and the Committee was required to file an amendment to its statement of organization with the SOS to report its date of qualification but failed to do so. On October 26, 2020, Genis and the 2020 Committee filed the second preelection campaign statement for the reporting

³⁴ Since Genis was a candidate on the November 3, 2020 General Election ballot, the 2018 Committee was required to file the first pre-election campaign statement with the City Clerk by the September 24, 2020 deadline.

³⁵ Since Genis was a candidate on the November 3, 2020 General Election ballot, the 2018 Committee was required to file the second pre-election campaign statement with the City Clerk by the October 22, 2020 deadline.

period of September 20, 2020 through October 17, 2020, and reported \$12,099 in contributions, \$8,186.60 in expenditures, and an ending cash balance of \$9,742 (Certification, Exhibit A-18). The 2020 Committee is still open and continues to have filing obligations. Below is a chart summarizing the 2020 Committee’s late campaign statements.

Statement/Type	Reporting Period	Due Date	Date Filed
Preelection	7/1/2020 – 9/19/2020	9/24/2020	9/28/20
Preelection	9/20/2020 – 10/17/2020	10/22/2020	10/26/2020
Semi-annual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
Semi-annual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
Semi-annual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
Semi-annual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semi-annual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semi-annual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semi-annual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

Summary of Contact

The Enforcement Division contacted Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee numerous times regarding this matter. Genis was responsive on occasion; however, ultimately, Genis neither resolved this case nor requested a hearing.

Overall, the Enforcement Division contacted Genis, the 2016 Committee, the 2018 Committee, and the 2020 Committee approximately twenty-six times throughout this case, as follows:

- October 28, 2019: email by Enforcement Division regarding late campaign statements
- November 13, 2019: email by Enforcement Division regarding late campaign statements
- November 26, 2019: email by Enforcement Division regarding late campaign statements
- December 12, 2019: email by Enforcement Division regarding late campaign statements
- January 29, 2020: email by Enforcement Division regarding late campaign statements
- February 11, 2020: email and replies between Genis and Enforcement Division regarding late campaign statements
- February 13, 2020: email and replies between Genis and Enforcement Division regarding campaign statements
- February 27, 2020: email by Enforcement Division regarding campaign statements

- April 4, 2020: email by Enforcement Division regarding campaign statements
- May 13, 2020: email by Enforcement Division regarding campaign statements
- June 10, 2020: email by Enforcement Division regarding campaign statements
- November 16, 2020: phone call with Genis and Enforcement Division
- November 16, 2020: two phone calls and two voicemails left for Genis by Enforcement Division
- October 26, 2020: email by Enforcement Division regarding late campaign statements
- October 27, 2020: email by Enforcement Division regarding late campaign statements
- June 27, 2021: email by Enforcement Division regarding late campaign statements
- August 31, 2021: email by Enforcement Division attorney regarding late campaign statements
- September 8, 2022: voicemail by Enforcement Division attorney regarding late campaign statements
- September 8, 2022: email by Enforcement Division attorney regarding late campaign statements
- October 6, 2022: phone call to Genis by Enforcement Division attorney
- April 5, 2024: Probable Cause Report served on Genis and all committees
- April 11, 2024: voicemail by Enforcement Division attorney
- April 11, 2024: email by Enforcement Division attorney regarding late campaign statements
- July 8, 2024: Accusation served on Genis and all committees
- October 1, 2024: letter to Genis and all committees informing them a Default Decision and Order would appear on the agenda for the October 17, 2024 Commission meeting as a notice item
- October 24, 2024: Notice of Intent to Enter Default Decision and Order to Genis and all committees informing them that the Default Decision and Order would be presented at the November 21, 2024 meeting for Commission action

VIOLATIONS

Genis and the 2016 Committee committed six violations of the Act, Genis and the 2018 Committee committed six violations of the Act, and Genis and the 2020 Committee committed seven violations of the Act as follows:

Genis and the 2016 Committee

COUNT 1

Failure to Timely File Semi-Annual Campaign Statement

Genis and the 2016 Committee had a duty to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019, by the January 31, 2020 due date. By failing to timely file the semi-annual campaign statement by January 31, 2020, Genis and the 2016 Committee violated Government Code Section 84200.

COUNT 2

Failure to Timely File Preelection Campaign Statements

Genis and the 2016 Committee had a duty to timely file preelection campaign statements for the reporting period of July 1, 2020 through September 19, 2020, due on September 24, 2020 and for the reporting period of September 20, 2020 through October 17, 2020 due on October 22, 2020. By failing to timely file the preelection campaign statements by September 24, 2020 and October 22, 2020 Genis and the 2016 Committee violated Government Code Sections 84200.5 and 84200.8.

COUNT 3

Failure to Timely File Semi-Annual Campaign Statement

Genis and the 2016 Committee had a duty to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 through December 31, 2020 by the February 1, 2021 due date. By failing to timely file the semi-annual campaign statement by February 1, 2021, Genis and the 2016 Committee violated Government Code Section 84200.

COUNT 4

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2016 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2021 through June 30, 2021 and July 1, 2021 through December 31, 2021 by the August 2, 2021 and January 31, 2022 due dates. By failing to timely file the semi-annual campaign statements by the August 2, 2021 and January 31, 2022 due dates, Genis and the 2016 Committee violated Government Code Section 84200.

COUNT 5

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2016 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2022 through June 30, 2022 and July 1, 2022 through December 31, 2022 by the August 1, 2022 and January 31, 2023 due dates. By failing to timely file the semi-annual campaign statements by the August 1, 2022 and January 31, 2023 due dates, Genis and the 2016 Committee violated Government Code Section 84200.

COUNT 6

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2016 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2023 through June 30, 2023 and July 1, 2023 through December 31, 2023 by the July 31, 2023 and January 31, 2024 due dates. By failing to timely file the semi-annual campaign statements by the July 31, 2023 and January 31, 2024 due dates, Genis and the 2016 Committee violated Government Code Section 84200.

Genis and the 2018 Committee

COUNT 7

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2018 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2019 through June 30, 2019 and July 1, 2019 through December 31, 2019 by the July 31, 2019 and January 31, 2020 due dates. By failing to timely file the semi-annual campaign statements by the July 31, 2019 and January 31, 2020 due dates, Genis and the 2018 Committee violated Government Code Section 84200

COUNT 8

Failure to Timely File Preelection Campaign Statements

Genis and the 2018 Committee had a duty to timely file preelection campaign statements for the reporting period of July 1, 2020 through September 19, 2020, due on September 24, 2020 and for the reporting period of September 20, 2020 through October 17, 2020 due on October 22, 2020. By failing to timely file the preelection campaign statements by September 24, 2020 and October 22, 2020, Genis and the 2018 Committee violated Government Code Sections 84200.5 and 84200.8.

COUNT 9

Failure to Timely File Semi-Annual Campaign Statement

Genis and the 2018 Committee had a duty to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 through December 31, 2020 by the February 1, 2021 due date. By failing to timely file the semi-annual campaign statement by February 1, 2021, Genis and the 2018 Committee violated Government Code Section 84200.

COUNT 10

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2018 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2021 through June 30, 2021 and July 1, 2021 through

December 31, 2021 by the August 2, 2021 and January 31, 2022 due dates. By failing to timely file the semi-annual campaign statements by the August 2, 2021 and January 31, 2022 due dates, Genis and the 2018 Committee violated Government Code Section 84200.

COUNT 11

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2018 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2022 through June 30, 2022 and July 1, 2022 through December 31, 2022 by the August 1, 2022 and January 31, 2023 due dates. By failing to timely file the semi-annual campaign statements by the August 1, 2022 and January 31, 2023 due dates, Genis and the 2018 Committee violated Government Code Section 84200.

COUNT 12

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2018 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2023 through June 30, 2023 and July 1, 2023 through December 31, 2023 by the July 31, 2023 and January 31, 2024 due dates. By failing to timely file the semi-annual campaign statements by the July 31, 2023 and January 31, 2024 due dates, Genis and the 2018 Committee violated Government Code Section 84200

Genis and the 2020 Committee

COUNT 13

Failure to Timely Amend a Statement of Organization

Genis and the 2020 Committee had a duty to timely file an amended statement of organization to report the Committee's date of qualification of September 24, 2020 within 10 days of qualification. Genis and the 2020 Committee failed to timely file an amended statement of organization to report the 2020 Committee's date of qualification. By failing to file an amended statement of organization, Genis and the 2020 Committee violated Government Code Section 84101, subdivision (a).

COUNT 14

Failure to Report Contributor Information

Genis and the 2020 Committee had a duty to timely report all contributor information for loans totaling \$3,815.99 on the preelection campaign statement covering the period of July 1, 2020 through September 19, 2020. Genis and the 2020 Committee failed to timely report all

contributor information for loans totaling \$3,815.99 on the preelection campaign statement covering the period of July 1, 2020 through September 19, 2020. By failing to timely report all contributor information, Genis and the 2020 Committee violated Government Code Section 84211.

COUNT 15

Failure to Timely File Preelection Campaign Statements

Genis and the 2020 Committee had a duty to timely file a preelection campaign statement for the reporting period of July 1, 2020 through September 19, 2020, due on September 24, 2020 and for the reporting period of September 20, 2020 through October 17, 2020 due on October 22, 2020. By failing to timely file the preelection campaign statements by September 24, 2020 and October 22, 2020, Genis and the 2020 Committee violated Government Code Sections 84200.5 and 84200.8.

COUNT 16

Failure to Timely File Semi-Annual Campaign Statement

Genis and the 2020 Committee had a duty to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 through December 31, 2020 by the February 1, 2021 due date. By failing to timely file the semi-annual campaign statement by February 1, 2021, Genis and the 2020 Committee violated Government Code Section 84200.

COUNT 17

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2020 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2021 through June 30, 2021 and July 1, 2021 through December 31, 2021 by the August 2, 2021 and January 31, 2022 due dates. By failing to timely file the semi-annual campaign statements by the August 2, 2021 and January 31, 2022 due dates, Genis and the 2020 Committee violated Government Code Section 84200.

COUNT 18

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2020 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2022 through June 30, 2022 and July 1, 2022 through December 31, 2022 by the August 1, 2022 and January 31, 2023 due dates. By failing to timely file the semi-annual campaign statements by the August 1, 2022 and January 31, 2023 due dates, Genis and the 2020 Committee violated Government Code Section 84200.

COUNT 19

Failure to Timely File Semi-Annual Campaign Statements

Genis and the 2020 Committee had a duty to timely file semi-annual campaign statements for the reporting period of January 1, 2023 through June 30, 2023 and July 1, 2023 through December 31, 2023 by the July 31, 2023 and January 31, 2024 due dates. By failing to timely file the semi-annual campaign statements by the July 31, 2023 and January 31, 2024 due dates, Genis and the 2020 Committee violated Government Code Section 84200

CONCLUSION

This matter consists of 19 counts of violating the Act, which carry a maximum total administrative penalty of \$95,000.³⁶

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 (e)(1) through (8): (1) The extent and gravity of the public harm caused by the specific violation; (2) The level of experience of the violator with the requirements of the Political Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) 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); (7) 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 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.³⁷

With respect to the first factor, the extent and the gravity of the public harm is significant. In this matter, Genis and the 2016 Committee, failed to timely file two preelection campaign statements, and eight semi-annual campaign statements. Genis and the 2018 Committee failed to timely file two preelection campaign statements, and ten semi-annual campaign statements. Genis and the 2020 Committee failed to timely file an amendment to the statement of organization, two preelection campaign statements, seven semi-annual campaign statements and failed to accurately report all contributions.

A central purpose of the Act is to ensure receipts and expenditures in election campaigns are fully and truthfully disclosed. The violations here include the failure to timely file thirty-one campaign statements. The Respondents' failure to timely file campaign statements, particularly the preelection campaign statements, deprived the public of important time-sensitive information regarding all of the

³⁶ Section 83116, subd. (c).

³⁷ Regulation 18361.5, subd. (e).

committees' activity prior to the elections. In mitigation, the 2016 Committee and the 2018 Committee were required to file preelection campaign statements in 2020 only because Genis was a candidate on the ballot in 2020 and Genis filed the preelection campaign statements for the 2020 Committee prior to the election.

Regarding the second factor, Genis has significant experience with the Act's requirements. Genis served as a Costa Mesa City Councilmember at various times from 1988 to 2020 and should have been aware of the requirements of the Act.

Regarding the third factor, the following cases were considered comparable cases:

Genis and the 2016 Committee:

Counts 1 and 3-6:

- *In the Matter of Anna Song and Friends of Anna Song for County Board of Education for 2020*, FPPC No. 20/950. (The Commission approved a default decision on January 18, 2024.) The respondent, among other violations, failed to timely file two semi-annual campaign statements disclosing \$5,712 in expenditures. The outstanding statements were not related to an upcoming election and were filed 470 days, and 288 days after they were due. The Commission imposed a penalty of \$3,500 per count for two counts.

Here, Genis and the 2016 Committee failed to timely file eight semi-annual campaign statements, all of which were post-election activity, like in *Song*. However, unlike in *Song*, the statements were never filed. Therefore, a higher penalty of \$4,000 per count is recommended.

Count 2:

- *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 preelection campaign statements when Payne was a candidate listed on the ballot. The statements were filed four days prior to the election. The Commission approved a penalty of \$3,000 per count for two counts.

Here, Genis was a candidate on the ballot in 2018. Since Genis's 2016 Committee was still open, Genis and the 2016 Committee were required to file preelection campaign statements, similar to *Payne*. However, unlike in *Payne*, Genis' 2016 Committee was not Genis' primary committee connected to her candidacy in 2018. Therefore, a lesser penalty of \$2,500 is recommended.

Genis and the 2018 Committee:

Counts 7 and 9-12:

- *In the Matter of Anna Song and Friends of Anna Song for County Board of Education for 2020*, FPPC No. 20/950. (The Commission approved a default decision on January 18, 2024.) The respondents, among other violations, failed to timely file two semi-annual campaign statements disclosing \$5,712 in expenditures. The outstanding statements were not related to an upcoming election and were filed 470 days, and 288 days after they were due. The Commission imposed a penalty of \$3,500 per count for two counts.

Here, Genis and the 2018 Committee failed to timely file ten semi-annual campaign statements, all of which were post-election activity, like in *Song*. However, unlike in *Song*, the statements were never filed. Therefore, a higher penalty of \$4,000 per count is recommended.

Count 8:

- *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 preelection campaign statements when Payne was a candidate listed on the ballot. The statements were filed four days prior to the election. The Commission approved a penalty of \$3,000 per count for two counts.

Here, Genis was a candidate on the ballot in 2016. Since Genis's 2018 Committee was still open, Genis and the 2018 Committee were required to file preelection campaign statements, similar to *Payne*. However, unlike *Payne*, Genis' 2018 Committee was not Genis' primary committee connected to her candidacy in 2016. Therefore, a lesser penalty of \$2,500 is recommended.

Genis and the 2020 Committee

Count 13:

- *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. Payne was experienced with the Act. The Commission imposed a penalty of \$2,000.

Here similar to *Payne*, Genis was also experienced with the Act, having previously run for office. Therefore, a similar penalty of \$2,000 is recommended.

Count 14:

- *In the Matter of Kern Neighborhoods for Responsible Regulation in Support of Measure J and Tim Blakeley*; FPPC No. 18/976. (The Commission approved a default decision on September 19, 2024.) Kern Neighborhoods for Responsible Regulation in Support of Measure J was a primarily formed committee in support of Measure J, a measure on the ballot in the November 6, 2018 General Election. On Schedule A, in the date section of a preelection campaign statement, the Committee and Blakeley cited date ranges for multiple contributions, instead of the specific date each contribution was made and the cumulative total from the contributor, in violation of Government Code Section 84211, subdivision (f). The Commission imposed a penalty of \$4,000.

Here, a lesser penalty than *Kern* is recommended. In *Kern* the amount of contributions received that included date ranges, instead of an exact date, was significant, ranging from \$2,000 to \$83,120 in contributions. Additionally, there were multiple contributions in which a date range was given, unlike here. Here, Genis failed to include the incurred date for one loan totaling \$3,815.99. Additionally, the amount of the loan was significantly less than in *Kern*, and the loan was from the candidate herself. Therefore, a lesser penalty of \$2,000 is recommended.

Count 15:

- *In the Matter of Eric Payne and Eric Payne for SCCCDC 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 preelection campaign statements when Payne was a candidate listed on the ballot. The statements were filed four days prior to the election. The Commission approved a penalty of \$3,000 per count for two counts.

Here, Genis was a candidate on the ballot in 2020 and therefore was required to file preelection campaign statements, similar to *Payne*. Additionally, similar to *Payne*, both campaign statements were filed prior to the election. Therefore, a similar penalty of \$3,000 is recommended.

Count 16-19

- *In the Matter of Anna Song and Friends of Anna Song for County Board of Education for 2020*, FPPC No. 20/950. (The Commission approved a default decision on January 18, 2024.) The respondents, among other violations, failed to timely file two semi-annual campaign statements disclosing \$5,712 in expenditures. The outstanding statements were not related to an upcoming election and were filed 470 days, and 288 days after they were due. The Commission imposed a penalty of \$3,500 per count for two counts.

Here, Genis and the 2020 Committee failed to timely file seven semi-annual campaign statements, all of which were post-election activity, like in *Song*. However, unlike in *Song*, the statements were never filed. Therefore, a higher penalty of \$4,000 per count is recommended.

Regarding the fourth factor and fifth factors, the Enforcement Division, throughout its investigation, did not find any evidence of an intent to conceal, deceive or mislead the public. It appears the violations were negligent as Genis has significant experience with the Act and, therefore, knew or should have known of the filing obligations. Additionally, most of the missing filings were post-election activity for the year Genis was on the ballot and the preelection campaign statements for the 2020 General Election were filed just a few days late. However, Genis was uncooperative at points during the investigation and did not engage with the Enforcement Division in a meaningful way. On February 11, 2020, Genis apologized for her poor response to Enforcement contact due to personal issues. Genis later provided additional details about a health-related problem in an email to Enforcement on February 13, 2020.

Regarding the sixth factor, Genis did not consult the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b).

Regarding the seventh factor, these violations appear to be a part of a pattern. There were additional late filing violations discovered during the course of the investigation of this case that were past the statute of limitation. These violations date back to the reporting period of October 23, 2016 through December 31, 2016. It is clear from reviewing the late filings of the three committees that Genis has a pattern of failing to timely file campaign statements, particularly after the relevant election, or failing to terminate her open committees.

Regarding the eighth factor, no corrective amendments have been made.

PROPOSED PENALTY

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

Counts	Violations: Genis and 2016 Committee	Proposed Penalty per Count
1	Failure to Timely File Semi-annual Campaign Statement	\$4,000
2	Failure to Timely File Preelection Campaign Statements	\$2,500
3	Failure to Timely File Semi-annual Campaign Statement	\$4,000
4	Failure to Timely File Semi-annual Campaign Statements	\$4,000
5	Failure to Timely File Semi-annual Campaign Statements	\$4,000
6	Failure to Timely File Semi-annual Campaign Statements	\$4,000
	Total:	\$22,500

Counts	Violations: Genis and the 2018 Committee	Proposed Penalty per Count
7	Failure to Timely File Semi-annual Campaign Statement	\$4,000
8	Failure to Timely File Preelection Campaign Statements	\$2,500
9	Failure to Timely File Semi-annual Campaign Statement	\$4,000
10	Failure to Timely File Semi-annual Campaign Statements	\$4,000
11	Failure to Timely File Semi-annual Campaign Statements	\$4,000
12	Failure to Timely File Semi-annual Campaign Statements	\$4,000
	Total:	\$22,500

Counts	Violations: Genis and the 2020 Committee	Proposed Penalty per Count
13	Failure to Timely Amend a Statement of Organization	\$2,000
14	Failure to Report Contributor Information	\$2,000
15	Failure to Timely File Preelection Campaign Statements	\$3,000
16	Failure to Timely File Semi-annual Campaign Statement	\$4,000
17	Failure to Timely File Semi-annual Campaign Statements	\$4,000
18	Failure to Timely File Semi-annual Campaign Statements	\$4,000
19	Failure to Timely File Semi-annual Campaign Statements	\$4,000
	Total:	\$23,000

Proposed Total Penalty:	\$68,000
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**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 3050, 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. 18/1359; Sandy Genis for Costa Mesa City Council 2016, Sandy Genis for Costa Mesa Mayor 2018, Sandy Genis for Costa Mesa Mayor 2020 and Sandy Genis* 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 February 27, 2024

EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated February 27, 2024, and accompanying certified mail receipts and USPS tracking

EXHIBIT A-3: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated June 6, 2024

EXHIBIT A-4: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated June 10, 2024

EXHIBIT A-5: Accusation, dated June 28, 2024

- EXHIBIT A-6: Proofs of Service on July 8, 2024, for Accusation and accompanying documents from process server, dated July 8, 2024
- EXHIBIT A-7: Statement to Respondents
- EXHIBIT A-8: Initial statement of organization for 2016 Committee, filed on February 9, 2015
- EXHIBIT A-9: 2016 Committee campaign statement, filed on February 11, 2020, for the reporting period of October 23, 2016 through December 31, 2016
- EXHIBIT A-10: 2016 Committee campaign statement, filed on February 11, 2020, for the reporting period of July 1, 2019 through December 31, 2019
- EXHIBIT A-11: 2016 Committee campaign statement, filed July 30, 2020, for the reporting period of January 1, 2020 through July 30, 2020.
- EXHIBIT A-12: 2018 Committee preelection campaign statements, dated September 28, 2018 and October 25, 2018, covering the periods of July 1, 2018 through September 22, 2018 and September 23, 2018 through October 20, 2018
- EXHIBIT A-13: 2018 Committee campaign statement, filed August 6, 2019, for the reporting period of January 1, 2019 through July 31, 2019
- EXHIBIT A-14: 2018 Committee campaign statement, filed February 11, 2020, for the reporting period of July 1, 2019 through December 31, 2019
- EXHIBIT A-15: 2018 Committee campaign statement, filed July 30, 2020, for the reporting period of January 1, 2020 through June 30, 2020
- EXHIBIT A-16: Initial statement of organization for 2020 Committee, filed on August 24, 2020
- EXHIBIT A-17: 2020 Committee campaign statement, filed September 28, 2020 for the reporting period of July 1, 2020 through September 19, 2020
- EXHIBIT A-18: 2020 Committee campaign statement, filed October 26, 2020 for the reporting period of September 20, 2020 through October 17, 2020
- EXHIBIT A-19: Notice of Default Decision and Order, dated October 1, 2024
- EXHIBIT A:20: Notice of Intent to Enter Default Decision and Order, dated October 24, 2024

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 23, 2024, at Sacramento, California.

Shaina Elkin

Shaina Elkin
Associate Governmental Program Analyst
Enforcement Division
Fair Political Practices Commission

Exhibit A-1

1 JAMES M. LINDSAY
Chief of Enforcement
2 MARISSA CORONA
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5932
5 Email: mcorona@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. 18/1359
12)
13) **REPORT IN SUPPORT OF A FINDING OF**
14) **PROBABLE CAUSE**
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

SANDY GENIS FOR COSTA MESA
CITY COUNCIL 2016, SANDY GENIS
FOR COSTA MESA MAYOR 2018,
SANDY GENIS FOR COSTA MESA
MAYOR 2020, SANDY GENIS,
MICHAEL HARMANOS

Conference Date: TBA
Conference Time: TBA
Conference Location: Commission Offices
1102 Q Street, Suite 3050
Sacramento, CA 95811

Respondents.

19 **INTRODUCTION**

20 Sandy Genis (“Genis”) was elected to Costa Mesa City Council during the November 6, 2012
21 General Election, re-elected during the November 8, 2016 General Election, and served on the City
22 Council until the end of 2020. Genis was an unsuccessful candidate for Costa Mesa Mayor in the
23 November 6, 2018 and November 3, 2020 General Elections.

24 Sandy Genis for Costa Mesa City Council 2016 (the “2016 Committee”), Sandy Genis for Costa
25 Mesa Mayor 2018 (the “2018 Committee”), and Sandy Genis for Costa Mesa Mayor 2020 (the “2020
26
27
28

1 Committee”) were Genis’s candidate-controlled committees. Michael Harmanos (“Harmanos”) served
2 as treasurer for the 2016 Committee. Genis served as treasurer for the 2018 and 2020 Committees.

3 The Committees, Genis, and Harmanos violated the Political Reform Act (the “Act”)¹ by failing
4 to timely file campaign statements and accurately report all required contributor information.

5 SUMMARY OF THE LAW

6 The Act and its regulations are amended from time to time. The discussion below regarding
7 jurisdiction, the standard for finding probable cause, and the contents of the probable cause report
8 include references to current law. Unless otherwise noted, all other legal references and discussions of
9 law pertain to the Act’s provisions as they existed at the time of the violations in this case.

10 Jurisdiction

11 The Fair Political Practices Commission (the “Commission”) has primary responsibility for the
12 impartial, effective administration and implementation of the Act.² This includes enforcement through
13 administrative prosecution.³ However, before the Commission’s Enforcement Division may
14 commence administrative prosecution by filing/serving an Accusation, a hearing officer (either the
15 General Counsel of the Commission or another attorney in the Commission’s Legal Division) must
16 determine whether there is probable cause that supports a reasonable belief or strong suspicion that one
17 or more violations of the Act occurred.⁴ Any finding of probable cause is required by law to be
18 announced publicly, which includes the posting of a summary of the allegations on the Commission’s
19 website.⁵ After a finding of probable cause, the Commission may then hold a hearing to determine what
20 violations have occurred—and levy an administrative penalty of up to \$5,000 for each violation.⁶

21 //

23 ¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are
24 to this code. The regulations of the Fair Political Practice Commission are contained in §§ 18104 through 18998 of Title 2 of
the California Code of Regulations, and all regulatory references are to this source.

25 ² Section 83111.

26 ³ Section 83116.

27 ⁴ Sections 83115.5 and 83116; Regulations 18361, subd. (b), and 18361.4.

28 ⁵ Regulation 18361.4, subd. (g).

⁶ Section 83116; Regulation 18361.4, subd. (g).

1 Standard for Finding Probable Cause

2 For the hearing officer to make a finding of probable cause, it is only necessary that he or she be
3 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act
4 has been violated.⁷ Probable cause may only be found if the Respondents were notified of the violations
5 at least 21 days prior to the hearing officer’s consideration of the alleged violations.⁸

6 Contents of the Probable Cause Report

7 The probable cause report is required to contain a summary of the law and evidence that
8 supports a finding of probable cause that each alleged violation of the Act has occurred, as well as a
9 description of any exculpatory evidence indicating a violation alleged in the report did not occur. The
10 evidence recited in the probable cause report may include hearsay.⁹

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

12 When enacting the Act, the people of California found and declared that previous laws
13 regulating political practices suffered from inadequate enforcement by state and local authorities.¹⁰ For
14 this reason, the Act is to be construed liberally to accomplish its purposes.¹¹

15 One purpose of the Act is to promote transparency by ensuring that receipts and expenditures in
16 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper
17 practices are inhibited.¹² Along these lines, the Act includes a comprehensive campaign reporting
18 system.¹³ Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act
19 will be “vigorously enforced.”¹⁴

20 //

21 //

23 ⁷ Regulation 18361.4, subd. (a).

24 ⁸ Section 83115.5.

25 ⁹ Regulation 18361.4, subd. (b).

26 ¹⁰ Section 81001, subd. (h).

27 ¹¹ Section 81003.

28 ¹² Section 81002, subd. (a).

¹³ Sections 84200, *et seq.*

¹⁴ Section 81002, subd. (f).

1 Duty to File Campaign Statements

2 At the core of the Act’s campaign reporting system is the requirement that committees must file
3 campaign statements and reports for certain periods and by certain deadlines. The Act requires
4 candidates and their controlled committees to file campaign statements at specific times disclosing
5 information regarding contributions received and expenditures made by the campaign committees.¹⁵

6 Definition of Committee

7 A “committee” includes any person or combination of persons who receive contributions
8 totaling \$2,000 or more in a calendar year.¹⁶ This is commonly known as a “recipient committee.” A
9 recipient committee that is controlled by a candidate or that acts jointly with a candidate in connection
10 with the making of expenditures is a “controlled committee.”¹⁷

11 Statement of Organization

12 Every committee must file a statement of organization within ten days after it qualifies as a
13 committee.¹⁸ A recipient committee is required to file a statement of organization within ten days after
14 its total amount of contributions received reaches \$2,000 or more.¹⁹ The committee must file the
15 original statement of organization with the Secretary of State (“SOS”) and a copy with the local filing
16 officer.²⁰

17 Pre-Election Campaign Statements

18 All candidates appearing on the ballot to be voted on at the next election, their controlled
19 committees, and committees primarily formed to support or oppose an elected officer, candidate, or a
20 measure appearing on the ballot to be voted on at the next election shall file the applicable pre-election
21 statements specified next in Section 84200.8.²¹

23 ¹⁵ Section 84200, *et seq.*

24 ¹⁶ Section 82013, subd. (a).

25 ¹⁷ Section 82016, subd. (a).

26 ¹⁸ Section 84101, subd. (a).

27 ¹⁹ Section 82013, subd. (a).

28 ²⁰ Sections 84101, subd. (a); and 84215.

²¹ Section 84200.5, subd. (a).

1 For the general election, a candidate must file a first pre-election campaign statement no later
2 than 40 days before the election for the reporting period ending 45 days before the election and a
3 second pre-election statement no later than 12 days before the election for the reporting period ending
4 17 days before the election.²² If a person has not previously filed a campaign statement, the period
5 covered begins on January 1.²³

6 Semi-Annual Campaign Statements

7 Recipient committees shall file semi-annual campaign statements each year no later than July 31
8 for the period ending June 30, and no later than January 31 for the period ending December 31.²⁴

9 Disclosure of Contributions and Contributor Information

10 A committee must disclose on campaign statements the total amount of all contributions
11 received, including loans. For contributions of \$100 or more, the statements must provide certain
12 identifying information about the source of a contribution, including the date of the loan.²⁵

13 Joint and Several Liability of the Candidate, Committee, and Treasurer

14 Every committee must have a treasurer.²⁶ It is the duty of a committee treasurer to ensure that
15 the committee complies with campaign reporting provisions of the Act.²⁷ A treasurer may be held
16 jointly and severally liable, along with the candidate and the committee, for violations committed by
17 the committee.²⁸

18 **SUMMARY OF THE EVIDENCE**

19 Respondent Sandy Genis (“Genis”) has significant experience with the Act. According to her
20 Facebook profile, “Costa Mesa Citizen Sandy Genis,” Genis served on the Costa Mesa City Council
21 from 1988 to 1996 and was a former Mayor of Costa Mesa.²⁹ Genis was again elected to Costa Mesa

22 ²² Section 84200.8.

23 ²³ Section 82046, subd. (b).

24 ²⁴ Section 84200.

25 ²⁵ Section 84211, subds. (a),(c) and (f)(5).

26 ²⁶ Section 84100.

27 ²⁷ Section 81004, 84100, 84104, and 84213; Regulation 18427.

28 ²⁸ Sections 83116.5 and 91006.

²⁹ https://www.facebook.com/SandyGenis4CostaMesa/about_details

1 City Council in 2012 and re-elected during the November 8, 2016 General Election. Genis served on
2 the City Council until the end of 2020, after an unsuccessful bid for Mayor during the November 6,
3 2018 and November 3, 2020 General Elections.

4 2016 Committee, Genis, and Harmanos

5 The 2016 Committee was Genis’s candidate-controlled committee for the 2016 campaign. On
6 February 9, 2015, the 2016 Committee filed an amendment to its statement of organization with SOS to
7 re-designate the committee from the 2012 election to the 2016 election. During the 2016 election, the
8 2016 Committee raised and spent approximately \$13,590 in contributions and \$13,652 in expenditures.

9 The last statement the 2016 Committee filed was the semi-annual statement covering the period
10 January 1, 2020 to June 30, 2020. The statement was timely filed. Prior to the filing covering January 1,
11 2020 to June 30, 2020, the statement covering the period of July 1, 2019 to December 31, 2019 was
12 filed 11 days late. The 2016 Committee, Genis, and Harmanos were required to file subsequent
13 campaign statements with the City Clerk. The following chart summarizes the 2016 Committee’s late
14 filings and required subsequent filings:

15

Statement/Type	Reporting Period	Due Date	Date Filed
Semi-annual	7/1/2019 – 12/31/2019	1/31/2020	2/11/2020 (late)
Semi-annual	1/1/2020 – 6/30/2020 ³⁰	7/31/2020	7/30/2020 (timely)
Pre-Election ³¹	7/1/2020 – 9/19/2020	9/24/2020	Not Filed
Pre-Election ³²	9/20/2020 – 10/17/2020	10/22/2020	Not Filed
Semi-annual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed

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23 ³⁰ The Committee reported an ending cash balance of \$1,093.75, \$0 contributions, and \$0 expenditures.

24 ³¹ Since Genis was a candidate for Mayor on the November 3, 2020 General Election ballot, the 2016 Committee,
25 Genis, and Harmanos were required to file the first pre-election campaign statement with the City Clerk by the September 24,
26 2020 deadline.

27 ³² Since Genis was a candidate for Mayor on the November 3, 2020 General Election ballot, the 2016 Committee,
28 Genis, and Harmanos were required to file the second pre-election campaign statement with the City Clerk by the October 22,
2020 deadline.

Semi-annual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
Semi-annual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
Semi-annual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semi-annual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semi-annual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semi-annual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

To date, the 2016 Committee remains open and continues to have a filing obligation.

On November 7, 2018, the SOS referred the 2016 Committee to the Enforcement Division for failure to pay Annual Fees for 2016, 2017, and 2018. The Enforcement Division made multiple attempts to obtain compliance regarding outstanding fees and campaign statements. Enforcement Division staff sent multiple emails to Genis, on October 28, 2019; November 13, 2019; November 26, 2019; December 12, 2019; January 29, 2020; February 11, 2020 (Genis responded the same day that the outstanding statements were filed with the City Clerk); February 13, 2020; February 27, 2020; April 7, 2020; May 13, 2020; and June 10, 2020.

2018 Committee and Genis

The 2018 Committee was Genis’s candidate-controlled committee for the 2018 campaign. Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 6, 2018 General Election but continued to serve on the City Council through 2020. Genis served as the treasurer of the 2018 Committee.

Genis was a candidate for Mayor on the November 6, 2018 General Election ballot, therefore the 2018 Committee and Genis were required to file pre-election campaign statements with the City Clerk by the September 27, 2018 and October 25, 2018 deadlines. The 2018 Committee filed the pre-election statements.

Following the pre-election statements, the last statement the 2018 Committee filed was the semi-annual campaign statement covering October 21, 2018, through December 31, 2018. The 2018

1 Committee has failed to file any subsequent statements. The following subsequent campaign statements
 2 were required to be filed with the City Clerk:

3 Statement/Type	Reporting Period	Due Date	Date Filed
4 Semi-annual	1/1/2019 – 6/30/2019	7/31/2019	Not Filed
5 Semi-annual	7/1/2019 – 12/31/2019	1/31/2020	Not Filed
6 Semi-annual	1/1/2020 – 6/30/2020	7/31/2020	Not Filed
7 Pre-Election ³³	7/1/2020 – 9/19/2020	9/24/2020	Not Filed
8 Pre-Election ³⁴	9/20/2020 – 10/17/2020	10/22/2020	Not Filed
9 Semi-annual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
10 Semi-annual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
11 Semi-annual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
12 Semi-annual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
13 Semi-annual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
14 Semi-annual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
15 Semi-annual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

16 To date, the 2018 Committee remains open and continues to have a filing obligation.

17 2020 Committee and Genis

18 Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 3, 2020 General
 19 Election and Genis’s term on the City Council ended in 2020. The 2020 Committee filed an initial
 20 statement of organization with the SOS on August 24, 2020 and indicated it had not yet qualified. Genis
 21 served as the treasurer of the 2020 Committee.

24 _____
 25 ³³ Since Genis was a candidate on the November 3, 2020 General Election ballot, the 2018 Committee was required
 to file the first pre-election campaign statement with the City Clerk by the September 24, 2020 deadline.

26 ³⁴ Since Genis was a candidate on the November 3, 2020 General Election ballot, the 2018 Committee was required
 to file the second pre-election campaign statement with the City Clerk by the October 22, 2020 deadline.

1 Genis was a candidate for Mayor on the November 3, 2020 General Election ballot; therefore,
 2 the 2020 Committee and Genis were required to file pre-election campaign statements with the City
 3 Clerk by the September 24, 2020 and October 22, 2020 deadlines. The 2020 Committee and Genis late-
 4 filed the first pre-election campaign statement on September 28, 2020 and reported \$6,763.99 in
 5 contributions and \$933.73 in expenditures. According to the campaign statement, the Committee
 6 qualified on or around September 15, 2020. Within 10 days of qualifying, the Committee was required
 7 to file an amendment to its statement of organization with the SOS to report its date of qualification but
 8 failed to do so.

9 After Genis failed to file the second pre-election campaign statement by the October 22, 2020
 10 deadline, the City Clerk referred the 2020 Committee to the Enforcement Division.

11 The Enforcement Division made multiple attempts to obtain compliance. On October 26, 2020
 12 and October 27, 2020, Enforcement Division staff made multiple phone calls, left voice messages, and
 13 sent emails. During a phone call on October 26, 2020, Genis stated the second pre-election campaign
 14 statement was dropped off at the City Hall on October 26, 2020.

15 On October 26, 2020, the 2020 Committee and Genis filed the second pre-election campaign
 16 statement with the City Clerk for the reporting period of September 20, 2020 through October 17, 2020,
 17 and reported \$12,099 in contributions, \$8,186.60 in expenditures, and an ending cash balance of
 18 \$9,742.

19 As of the date of this report, below is a chart detailing the 2020 Committee's late and outstanding
 20 filings:

Statement/Type	Reporting Period	Due Date	Date Filed
Pre-election	7/1/2020 – 9/19/2020	9/24/2020	9/28/20 (late)
Pre-election	9/20/2020 – 10/17/2020	10/22/2020	10/26/2020 (late)
Semi-annual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
Semi-annual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed

Semi-annual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
Semi-annual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semi-annual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semi-annual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semi-annual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

Additionally, according to the 2020 Committee’s pre-election campaign statement covering the period of July 1, 2020 to September 19, 2020, Genis loaned the Committee \$3,815.99. However, Genis failed to include the date on which the loan was incurred, as required by the Act. The failure to report the date prevented the Enforcement Division from determining whether 24-Hour Contribution reports were required.

The City Clerk contacted Genis regarding outstanding statements for the 2016, 2018, and 2020 Committees on January 25, 2021; February 2, 2021; February 4, 2021; and February 9, 2021. After Genis failed to file the required campaign statements, the City Clerk made a second referral to the Enforcement Division.

The Enforcement Division made multiple attempts to obtain compliance. On August 31, 2022; September 8, 2022; September 28, 2022; and October 6, 2022 the Enforcement Division made multiple phone calls and sent emails. Genis was unresponsive to these contacts.

VIOLATIONS

2016 Committee, Genis, and Harmanos

Count 1: Failure to Timely File Semi-Annual Campaign Statement

The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020 deadline, in violation of Government Code Section 84200.

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1 Count 2: Failure to Timely File Pre-Election Campaign Statement

2 The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
3 statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24,
4 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.

5 Count 3: Failure to Timely File Pre-Election Campaign Statement

6 The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
7 statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22,
8 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.

9 Count 4: Failure to Timely File Semi-Annual Campaign Statement

10 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
11 statement for the reporting period of October 18, 2020 though December 31, 2020 by the February 1,
12 2020 deadline, in violation of Government Code Section 84200.

13 Count 5: Failure to Timely File Semi-Annual Campaign Statement

14 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
15 statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021
16 deadline, in violation of Government Code Section 84200.

17 Count 6: Failure to Timely File Semi-Annual Campaign Statement

18 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
19 statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022
20 deadline, in violation of Government Code Section 84200.

21 Count 7: Failure to Timely File Semi-Annual Campaign Statement

22 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
23 statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022
24 deadline, in violation of Government Code Section 84200.

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26 //

1 Count 8: Failure to Timely File Semi-Annual Campaign Statement

2 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
3 statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023
4 deadline, in violation of Government Code Section 84200.

5 Count 9: Failure to Timely File Semi-Annual Campaign Statement

6 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
7 statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023
8 deadline, in violation of Government Code Section 84200.

9 Count 10: Failure to Timely File Semi-Annual Campaign Statement

10 The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
11 statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024
12 deadline, in violation of Government Code Section 84200.

13 *2018 Committee and Genis*

14 Count 11: Failure to Timely File Semi-Annual Campaign Statement

15 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
16 reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 deadline, in violation of
17 Government Code Section 84200.

18 Count 12: Failure to Timely File Semi-Annual Campaign Statement

19 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
20 reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020 deadline, in
21 violation of Government Code Section 84200.

22 Count 13: Failure to Timely File Semi-Annual Campaign Statement

23 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
24 reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 deadline, in violation of
25 Government Code Section 84200.

26 //

1 Count 14: Failure to Timely File Pre-Election Campaign Statement

2 The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the
3 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in
4 violation of Government Code Sections 84200.5 and 84200.8.

5 Count 15: Failure to Timely File Pre-Election Campaign Statement

6 The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the
7 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in
8 violation of Government Code Sections 84200.5 and 84200.8.

9 Count 16: Failure to Timely File Semi-Annual Campaign Statement

10 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
11 reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in
12 violation of Government Code Section 84200.

13 Count 17: Failure to Timely File Semi-Annual Campaign Statement

14 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
15 reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation
16 of Government Code Section 84200.

17 Count 18: Failure to Timely File Semi-Annual Campaign Statement

18 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
19 reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in
20 violation of Government Code Section 84200.

21 Count 19: Failure to Timely File Semi-Annual Campaign Statement

22 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
23 reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation
24 of Government Code Section 84200.

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1 Count 20: Failure to Timely File Semi-Annual Campaign Statement

2 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
3 reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in
4 violation of Government Code Section 84200.

5 Count 21: Failure to Timely File Semi-Annual Campaign Statement

6 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
7 reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of
8 Government Code Section 84200.

9 Count 22: Failure to Timely File Semi-Annual Campaign Statement

10 The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
11 reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in
12 violation of Government Code Section 84200.

13 *2020 Committee and Genis*

14 Count 23: Failure to Timely File Amendment to Statement of Organization

15 The 2020 Committee and Genis failed to timely amend its statement of organization with the
16 SOS and Costa Mesa City Clerk, due within 10 days of qualifying as a recipient committee, in violation
17 of Government Code Section 84101.

18 Count 24: Failure to Timely File Pre-Election Campaign Statement

19 The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the
20 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in
21 violation of Government Code Sections 84200.5 and 84200.8.

22 Count 25: Failure to Report Contributor Information

23 The 2020 Committee and Gensis failed to timely report all contributor information for loans
24 totaling \$3,815.99 on the pre-election statement covering the period of July 1, 2020 through September
25 19, 2020, in violation of Government Code Section 84211.

26 //

1 Count 26: Failure to Timely File Pre-Election Campaign Statement

2 The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the
3 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in
4 violation of Sections Government Code 84200.5 and 84200.8.

5 Count 27: Failure to Timely File Semi-Annual Campaign Statement

6 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
7 reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in
8 violation of Government Code Section 84200.

9 Count 28: Failure to Timely File Semi-Annual Campaign Statement

10 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
11 reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation
12 of Government Code Section 84200.

13 Count 29: Failure to Timely File Semi-Annual Campaign Statement

14 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
15 reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in
16 violation of Government Code Section 84200.

17 Count 30: Failure to Timely File Semi-Annual Campaign Statement

18 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
19 reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation
20 of Government Code Section 84200.

21 Count 31: Failure to Timely File Semi-Annual Campaign Statement

22 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
23 reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in
24 violation of Government Code Section 84200.

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26 //

1 Count 32: Failure to Timely File Semi-Annual Campaign Statement

2 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
3 reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of
4 Government Code Section 84200.

5 Count 33: Failure to Timely File Semi-Annual Campaign Statement

6 The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
7 reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in
8 violation of Government Code Section 84200.

9 **EXCULPATORY INFORMATION**

10 The Enforcement Division has no knowledge of any exculpatory information.

11 **OTHER RELEVANT EVIDENCE**

12 On February 11, 2020, Genis apologized for her poor response to Enforcement contact due to
13 personal issues. Genis later provided additional details about a health-related problem in an email to
14 Enforcement on February 13, 2020.

15 Genis served as a Costa Mesa City Councilmember at various times from 1988 to 2020 and
16 should have been aware of the requirements of the Act. Genis failed to terminate each of her controlled
17 committees. Therefore, each committee continues to have a filing obligation. Following an election,
18 each committee was required to file subsequent semi-annual campaign statements. In addition, each
19 committee controlled by Genis was required to file pre-election campaign statements since Genis was a
20 candidate on a ballot to be voted on. The Committees, Genis, and Harmanos have failed to timely file
21 numerous other campaign statements, which are included in this Report for informational purposes only
22 since these violations are past the 5-year statute of limitations:

23 *2016 Committee, Genis, and Harmanos*

Statement/Type	Reporting Period	Due Date	Date Filed
Semi-annual	10/23/2016 – 12/31/2016	1/31/2017	2/9/2017 (late)
Semi-annual	1/1/2017 – 6/30/2017	7/31/2017	9/22/2017 (late)

Semi-annual	7/1/2017 – 12/31/2017	1/31/2018	3/20/2018 (late)
Semi-annual	1/1/2018 – 6/30/2018	7/31/2018	8/16/2018 (late)
Pre-Election ³⁵	7/1/2018 – 9/22/2018 ³⁶	9/27/2018	2/11/2020 (late)
Pre-Election ³⁷	9/23/2018 – 10/20/2018 ³⁸	10/25/2018	2/11/2020 (late)
Semi-annual	10/21/2018 – 12/31/2018	1/31/2018	2/11/2020 (late)

2018 Committee and Genis

Statement/Type	Reporting Period	Due Date	Date Filed
Statement of Organization	9/9/2018	9/19/2018	Not Filed
Pre-Election	7/1/2018 – 9/22/2018	9/27/2018	9/28/2018 (late)
Semi-annual	10/21/2018– 12/31/2018	1/31/2018	2/19/2019 (late)

CONCLUSION

Probable cause exists to believe that the 2016 Committee, Genis, and Harmanos, the 2018 Committee, and the 2020 Committee violated the Act as detailed above. The Enforcement Division respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.

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³⁵ Since Genis was a candidate on the November 6, 2018 General Election ballot, the 2016 Committee, Genis, and Harmanos were required to file the first pre-election campaign statement with the City Clerk by the September 27, 2018 deadline.

³⁶ The Committee filed a semi-annual campaign statement for the reporting period of July 1, 2018 through December 31, 2018.

³⁷ Since Genis was a candidate on the November 6, 2018 General Election ballot, the 2016 Committee, Genis, and Harmanos were required to file the second pre-election campaign statement with the City Clerk by the October 25, 2018 deadline.

³⁸ The Committee filed a semi-annual campaign statement for the reporting period of July 1, 2018 through December 31, 2018.

1 Dated: February 27, 2024

2 Respectfully Submitted,

3 **FAIR POLITICAL PRACTICES COMMISSION**

4 James M. Lindsay
5 Enforcement Chief

6 

7 _____
8 By: Marissa Corona
9 Commission Counsel
10 Enforcement Division
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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, Suite 3050, Sacramento, California 95811. On February 27, 2024, I served the following document(s):

1. Letter dated February 27, 2024 from Marissa Corona;
2. FPPC Case No. 2018-01359 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 _____ 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.**

By United States Postal Service. I enclosed the documents in a sealed envelope or package addressed to the person at the address 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, with postage fully prepaid.

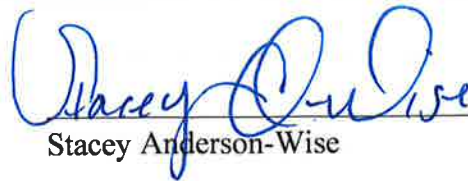
I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

**Sandy Genis o/b/o
Sandy Genis for Costa Mesa City Council 2016
Sandy Genis for Costa Mesa Mayor 2018
Sandy Genis for Costa Mesa Mayor 2020
1586 Myrtlewood St.
Costa Mesa, CA 92626**

**Michael Harmanos
173 E. Wilson Street, #C
Costa Mesa, CA 92627**

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on February 27, 2024.


Stacey Anderson-Wise

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2018, Mayor 2020

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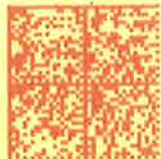
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FAQs

Exhibit A-3

JAMES M. LINDSAY
Chief of Enforcement
MARISSA CORONA
Commission Counsel
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street, Suite 3050
Sacramento, CA 95811
Telephone: (279) 237-5932
Email: MCorona@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) FPPC No. 2018-01359
)
SANDY GENIS FOR COSTA MESA CITY) EX PARTE REQUEST FOR A FINDING OF
COUNCIL 2016, SANDY GENIS FOR) PROBABLE CAUSE AND AN ORDER THAT
COSTA MESA MAYOR 2018, SANDY) AN ACCUSATION BE PREPARED AND
GENIS FOR COSTA MESA MAYOR) SERVED
2020, SANDY GENIS, MICHAEL)
HARMANOS) Gov. Code § 83115.5
)
)
Respondent.

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 Sandy Genis (“Genis”) Sandy Genis for Costa Mesa City Council 2016 (“2016 Committee”), Sandy Genis for Costa Mesa Mayor 2018 (“2018 Committee”), Sandy Genis for Costa Mesa Mayor 2020 (“2020 Committee”) and Michael Harmanos (“Harmanos”) were served with a copy of a report in support of a finding of probable cause (“PC Report”) in the above-entitled matter.² The PC Report, attached as “Exhibit A,” was part of a packet of materials, including a cover letter, a memorandum describing probable cause proceedings, and a probable cause checklist form, which was sent to Genis and the Committees on

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 §§ 18104 through 18998 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 February 27, 2024 by certified mail, with return receipt requested, and was returned to the Enforcement
2 Division on April 5, 2024. Harmanos was sent the PC report on April 30, 2024, by certified mail, with
3 return receipt requested, and was delivered on May 3, 2024. A copy of the proofs of service, returned
4 mail, and/or return receipts for each respondent is attached as “Exhibit B.”

5 In the cover letter dated February 27, 2024 and the attached materials, Respondents were advised
6 that they could respond in writing to the PC Report and orally present the case to the Hearing Officer at a
7 probable cause conference to be held in Sacramento. Respondents were further advised that in order to
8 have a probable cause conference they needed to make a written request for one within 21 days of the date
9 they received the PC Report, or the date requested records were sent by the Enforcement Division.
10 Additionally, Respondents were advised that if they did not request a probable cause conference, such a
11 conference would not be held, and probable cause would be determined based solely on the PC Report
12 and any written response submitted within 21 days of the date they were served with the PC Report, or
13 the date requested records were sent by the Enforcement Division. To date, Respondents have not
14 submitted a written response or requested a probable cause conference.

15 WHEREFORE, based on the attached PC Report, the Enforcement Division requests a finding by
16 the Hearing Officer that probable cause exists to believe that Respondents committed 33 violations of the
17 Act, stated as follows:

18 *2016 Committee, Genis and Harmanos*

19 Count 1: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
20 statement for the reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020
21 deadline, in violation of Government Code Section 84200.

22 Count 2: The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
23 statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24,
24 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8

25 ///

1 Count 3: The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
2 statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22,
3 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.

4
5 Count 4: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
6 statement for the reporting period of October 18, 2020 though December 31, 2020 by the February 1,
7 2020 deadline, in violation of Government Code Section 84200.

8
9 Count 5: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
10 statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021
11 deadline, in violation of Government Code Section 84200.

12
13 Count 6: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
14 statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022
15 deadline, in violation of Government Code Section 84200.

16
17 Count 7: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
18 statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022
19 deadline, in violation of Government Code Section 84200.

20
21 Count 8: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
22 statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023
23 deadline, in violation of Government Code Section 84200.

24 ///

1 Count 9: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
2 statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023
3 deadline, in violation of Government Code Section 84200.

4
5 Count 10: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
6 statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024
7 deadline, in violation of Government Code Section 84200.

8 *2018 Committee and Genis*

9 Count 11: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
10 reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 deadline, in violation of
11 Government Code Section 84200.

12 Count 12: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
13 reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020 deadline, in
14 violation of Government Code Section 84200.

15
16 Count 13: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
17 the reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 deadline, in violation
18 of Government Code Section 84200.

19
20 Count 14: The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the
21 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in
22 violation of Government Code Sections 84200.5 and 84200.8.

23 ///

1 Count 15: The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the
2 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in
3 violation of Government Code Sections 84200.5 and 84200.8.

4
5 Count 16: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
6 reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in
7 violation of Government Code Section 84200.

8
9 Count 17: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
10 the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in
11 violation of Government Code Section 84200.

12
13 Count 18: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
14 the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in
15 violation of Government Code Section 84200.

16
17 Count 19: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
18 the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in
19 violation of Government Code Section 84200.

20
21 Count 20: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
22 the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in
23 violation of Government Code Section 84200.

24 ///

1 Count 21: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
2 reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of
3 Government Code Section 84200.

4
5 Count 22: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
6 reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in
7 violation of Government Code Section 84200.

8 *2020 Committee and Genis*

9 Count 23: The 2020 Committee and Genis failed to timely amend its statement of organization with the
10 SOS and Costa Mesa City Clerk, due within 10 days of qualifying as a recipient committee, in violation
11 of Government Code Section 84101.

12 Count 24: The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the
13 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in
14 violation of Government Code Sections 84200.5 and 84200.8.

15
16 Count 25: The 2020 Committee and Gensis failed to timely report all contributor information for loans
17 totaling \$3,815.99 on the pre-election statement covering the period of July 1, 2020 through September
18 19, 2020, in violation of Government Code Section 84211.

19
20 Count 26: The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the
21 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in
22 violation of Sections Government Code 84200.5 and 84200.8.

23 ///

1 Count 27: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
2 reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in
3 violation of Government Code Section 84200.

4
5 Count 28: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
6 reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation
7 of Government Code Section 84200.

8
9 Count 29: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
10 reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in
11 violation of Government Code Section 84200.

12
13 Count 30: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
14 reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation
15 of Government Code Section 84200.

16
17 Count 31: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
18 reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in
19 violation of Government Code Section 84200.

20
21 Count 32: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for
22 the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation
23 of Government Code Section 84200.

24
25
26
27
28
///

1 Count 33: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
2 reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in
3 violation of Government Code Section 84200.

4
5 A copy of this Request was mailed via U.S. Mail to the Respondents on June 6, 2024 at the last
6 known address, as follows:

7 Michael Harmanos
8 2244 Eva Street
9 Napa, CA 94559

10 Sandy Genis
11 Sandy Genis for Costa Mesa City Council 2016
12 Sandy Genis for Costa Mesa Mayor 2018
13 Sandy Genis for Costa Mesa Mayor 2020
14 1586 Myrtlewood Street
15 Costa Mesa, CA 92626

16 Dated: June 6, 2024

17 Respectfully Submitted,

18 **FAIR POLITICAL PRACTICES COMMISSION**

19 James M. Lindsay
20 Chief of Enforcement

21 

22 By: Marissa Corona
23 Commission Counsel
24 Enforcement Division

Exhibit A-4

**FPPC No. 2018-01359, In the matter of SANDY GENIS FOR COSTA MESA CITY COUNCIL
2016, SANDY GENIS FOR COSTA MESA MAYOR 2018, SANDY GENIS FOR COSTA MESA
MAYOR 2020, SANDY GENIS, MICHAEL HARMANOS**

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 3050, 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

Michael Harmanos
2244 Eva Street
Napa, CA 94559

Sandy Genis
1586 Myrtlewood Street
Costa Mesa, CA 92626

(By Personal Service) On Tuesday, June 11, 2024, at approximately 9:30 a.m., I personally served:

Marissa Corona, Commission Counsel, at 1102 Q Street, Suite 3050, 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 June 11, 2024



Sasha Linker

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3
4 In the Matter of) FPPC No. 2018-01359
))
5 SANDY GENIS FOR COSTA MESA CITY) FINDING OF PROBABLE CAUSE AND
COUNCIL 2016, SANDY GENIS FOR) ORDER TO PREPARE AND SERVE AN
6 COSTA MESA MAYOR 2018, SANDY) ACCUSATION
GENIS FOR COSTA MESA MAYOR)
7 2020, SANDY GENIS, MICHAEL) Gov. Code § 83115.5
HARMANOS)
8)
Respondents.)

9
10 By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation
11 Be Prepared and Served (“Ex Parte Request”), the Enforcement Division submitted the above-entitled
12 matter to the Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request
13 the Enforcement Division served a Report in Support of a Finding of Probable Cause (“PC Report”) on
14 Respondents Sandy Genis (“Genis”), Sandy Genis for Costa Mesa City Council 2016 (“the 2016
15 Commttee”), Sandy Genis for Costa Mesa Mayor 2018 (“the 2018 Committee”) and Sandy Genis for
16 Costa Mesa Mayor 2020 (“the 2020 Committee”) concerning this matter on April 5, 2024 and served the
17 PC Report on Michael Harmanos (“Harmanos”) concerning this matter on May 3, 2024. All Respondents
18 were served the PC Report by certified mail with a return receipt requested. Accompanying the PC Report
19 was a packet of materials that informed Respondents of their right to file a written response to the PC
20 Report and to request a probable cause conference within 21 days following service of the PC Report.
21 During the 21 days that followed the service of the PC Report, Respondents did not file a response.
22 Pursuant to California Code of Regulations Title 2, section 18361.4, a determination of probable cause
23 may be made solely on papers submitted when the respondent does not request a probable cause
24 conference.¹

25
26
27 ¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the
Fair Political Practices Commission are contained in Sections 18104 through 18998 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
6 sufficiently supports a reasonable belief or strong suspicion that the Act has been violated.”²

7 The PC Report served on Respondents Genis, Harmanos, the 2016 Committee, the 2018
8 Committee, and the 2020 Committee, and the subsequent Ex Parte Request in this matter alleges 33
9 violations of the Political Reform Act were committed, as follows:

10 *2016 Committee, Genis and Harmanos*

11 Count 1: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
12 statement for the reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020
13 deadline, in violation of Government Code Section 84200.

14
15 Count 2: The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
16 statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24,
17 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8

18
19 Count 3: The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
20 statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22,
21 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.

22
23 Count 4: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
24 statement for the reporting period of October 18, 2020 though December 31, 2020 by the February 1,
25 2021 deadline, in violation of Government Code Section 84200.

26
27 _____
² Cal. Code Reg., tit. 2, § 18361.4, subd. (a).

1 Count 5: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
2 statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021
3 deadline, in violation of Government Code Section 84200.

4
5 Count 6: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
6 statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022
7 deadline, in violation of Government Code Section 84200.

8
9 Count 7: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
10 statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022
11 deadline, in violation of Government Code Section 84200.

12
13 Count 8: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
14 statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023
15 deadline, in violation of Government Code Section 84200.

16
17 Count 9: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
18 statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023
19 deadline, in violation of Government Code Section 84200.

20
21 Count 10: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign
22 statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024
23 deadline, in violation of Government Code Section 84200.

24 *2018 Committee and Genis*

25 Count 11: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
26 reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 deadline, in violation of
27 Government Code Section 84200.

1 Count 12: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
2 reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020 deadline, in
3 violation of Government Code Section 84200.

4
5 Count 13: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
6 the reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 deadline, in violation
7 of Government Code Section 84200.

8
9 Count 14: The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the
10 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in
11 violation of Government Code Sections 84200.5 and 84200.8.

12
13 Count 15: The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the
14 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in
15 violation of Government Code Sections 84200.5 and 84200.8.

16
17 Count 16: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
18 reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in
19 violation of Government Code Section 84200.

20
21 Count 17: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
22 the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in
23 violation of Government Code Section 84200.

24
25 Count 18: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
26 the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in
27 violation of Government Code Section 84200.

1 Count 19: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
2 the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in
3 violation of Government Code Section 84200.

4
5 Count 20: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for
6 the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in
7 violation of Government Code Section 84200.

8
9 Count 21: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
10 reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of
11 Government Code Section 84200.

12 Count 22: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the
13 reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in
14 violation of Government Code Section 84200.

15
16 *2020 Committee and Genis*

17 Count 23: The 2020 Committee and Genis failed to timely amend its statement of organization with the
18 SOS and Costa Mesa City Clerk, due within 10 days of qualifying as a recipient committee, in violation
19 of Government Code Section 84101.

20 Count 24: The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the
21 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in
22 violation of Government Code Sections 84200.5 and 84200.8.

23
24 Count 25: The 2020 Committee and Gensis failed to timely report all contributor information for loans
25 totaling \$3,815.99 on the pre-election statement covering the period of July 1, 2020 through September
26 19, 2020, in violation of Government Code Section 84211.

1 Count 26: The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the
2 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in
3 violation of Sections Government Code 84200.5 and 84200.8.

4
5 Count 27: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
6 reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in
7 violation of Government Code Section 84200.

8
9 Count 28: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
10 reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation
11 of Government Code Section 84200.

12
13 Count 29: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
14 reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in
15 violation of Government Code Section 84200.

16
17 Count 30: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
18 reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation
19 of Government Code Section 84200.

20
21 Count 31: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
22 reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in
23 violation of Government Code Section 84200.

24
25 Count 32: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for
26 the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation
27 of Government Code Section 84200.

1 Count 33: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the
2 reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in
3 violation of Government Code Section 84200.

4
5
6 Based on the Ex Parte Request given to me, I find that notice has been given to Genis, Harmanos,
7 the 2016 Committee, the 2018 Committee, and the 2020 Committee.³ I further find, based on the PC
8 Report and the Ex Parte Request, that there is probable cause to believe that Genis, Harmanos, the 2016
9 Committee, the 2018 Committee and the 2020 Committee violated the Political Reform Act as alleged in
10 Counts 1-33, as identified above.

11 I therefore direct that the Enforcement Division issue an accusation against Genis, Harmanos, the
12 2016 Committee, the 2018 Committee, and the 2020 Committee in accordance with this finding.

13 IT IS SO ORDERED.

14
15 Dated: 6/10/2024

L. Karen Harrison

16
17 Hearing Officer
18 Fair Political Practices Commission
19
20
21
22
23
24
25
26

27
28 ³ Government Code § 83115.5; Cal. Code Reg., tit. 2, §18361.4, subd. (c).

Exhibit A-5

1 JAMES M. LINDSAY
Chief of Enforcement
2 MARISSA CORONA
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q St, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5932
5 Email: mcorona@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. 18/1359
12)
13 SANDY GENIS FOR COSTA MESA)
CITY COUNCIL 2016, SANDY GENIS) **ACCUSATION**
14 FOR COSTA MESA MAYOR 2018,)
SANDY GENIS FOR COSTA MESA)
15 MAYOR 2020, SANDY GENIS,) (Gov. Code §11503)
MICHAEL HARMANOS)
16)
Respondents.)
17

18 Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding
19 of probable cause pursuant to Government Code Section 83115.5, alleges the following:

20 **JURISDICTION**

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

23 2. The authority to bring this action is derived from Title 2, California Code of Regulations,
24 Sections 18361 and 18361.4, subdivision (g), and the statutory law of the State of California,
25 specifically including, but not limited to, Government Code Sections 83111, 83116, and 91000.5,
26 which assign to the Enforcement Division the duty to administer, implement, and enforce the
27 provisions of the Political Reform Act, found at Government Code Sections 81000 through 91014.
28

1 3. When enacting the Political Reform Act (the “Act”),¹ California voters specifically found
2 and declared that previous laws regulating political practices had suffered from inadequate
3 enforcement, and it was their purpose to ensure that the Act be vigorously enforced.²

4 4. To that end, Section 81003 requires that the Act be liberally construed to achieve its
5 purposes.

6 5. One of the stated purposes of the Act is to ensure that receipts and expenditures in election
7 campaigns are fully and truthfully disclosed so that voters are fully informed and improper practices
8 are inhibited.³ Another purpose is to provide adequate enforcement mechanisms so that the Act will
9 be “vigorously enforced.”⁴

10 RESPONDENTS

11 6. Respondent, Genis (“Genis”) was elected to the Costa Mesa City Council during the
12 November 6, 2012 General Election.

13 7. Genis was re-elected during the November 8, 2016 General Election and served on the
14 Costa Mesa City Council through 2020.

15 8. Sandy Genis for Costa Mesa City Council 2016 (the “2016 Committee”) was Genis’
16 controlled committee in the 2016 election.

17 9. Michael Harmanos (“Harmanos”) served as treasurer for the 2016 Committee.

18 10. Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 6, 2018
19 and November 3, 2020 General Elections.

20 11. Sandy Genis for Costa Mesa Mayor 2018 (the “2018 Committee”) was Genis’ controlled
21 committee in the 2018 election.

22 12. Genis for Costa Mesa Mayor 2020 (the “2020 Committee”) was Genis’s candidate-
23 controlled committee for the 2020 election.

24 13. Genis served as treasurer for the 2018 and 2020 Committees.
25

26 ¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the
27 Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of
Regulations.

28 ² Sections 81001, subdivision (h), and 81002, subdivision (f).

³ Section 81002, subdivision (a).

⁴ Section 81002, subdivision (f).

1 **APPLICABLE LAW**

2 14. All applicable law in this Accusation is the law as it existed during the relevant time for
3 the violations alleged.

4 **Committee**

5 15. Under the Act, “committee” means any person or combination of persons who directly or
6 indirectly receives contributions totaling \$2,000 or more in a calendar year.⁵

7 16. This type of committee is known as a recipient committee.

8 **Duty to File and Amend Statement of Organization**

9 17. A recipient committee must file a statement of organization within 10 days of the
10 committee reaching the \$2,000 threshold.⁶

11 18. The statement is required to include the name of the committee.⁷

12 19. If there is a change to any of the information contained in the statement of organization,
13 an amendment shall be filed within 10 days to reflect the change.⁸

14 **Duty to File Campaign Statements**

15 20. The Act requires committees and treasurers to file campaign statements and reports at
16 specific times disclosing information regarding contributions received and expenditures made by
17 the campaign committees.⁹

18 21. If the filing due date for a statement or report falls on a Saturday, Sunday, or official
19 state holiday, then the filing due date shall be extended to the next regular business day.¹⁰

20 22. This extension does not apply to 24-hour contribution reports when the due date for
21 these reports falls on a Saturday, Sunday, or official state holiday immediately prior to an
22 election.¹¹

23 ///

24
25 _____
26 ⁵ Section 82013, subdivision (a).

27 ⁶ Section 84101.

28 ⁷ Section 84102.

⁸ Section 84103, subd (a).

⁹ See Section 84200, *et seq.*

¹⁰ Regulation 18116, subd. (a).

¹¹ Regulation 18116, subd. (b).

1 Duty to File Pre-Election Campaign Statements

2 23. All candidates appearing on the ballot to be voted on at the next election, their controlled
3 committees, and committees primarily formed to support or oppose an elected officer, candidate, or
4 a measure appearing on the ballot to be voted on at the next election shall file the applicable pre-
5 election statements specified in Section 84200.8.¹²

6 24. Applicable pre-election campaign statements shall be filed as follows: (1) for the period
7 ending 45 days before the election, the statement shall be filed no later than 40 days before the
8 election, and (2) for the period ending 17 days before the election the statement shall be filed no later
9 than 12 days before the election.¹³

10 Duty to File Semiannual Campaign Statements

11 25. Recipient committees shall file semiannual campaign statements each year no later than
12 July 31 for the period ending June 30, and no later than January 31 for the period ending December
13 31 if they have made contributions or independent expenditures, including payments to a slate
14 mailer organization, during the six-month period before the closing date of the statements.¹⁴

15 Disclosure of Contributions and Contributor Information

16 26. A committee must disclose on campaign statements the total amount of all contributions
17 received, including loans.

18 27. For contributions of \$100 or more, the statements must provide certain identifying
19 information about the source of a contribution, including the date of the loan.¹⁵

20 Joint and Several Liability of Candidate, Committee, and Treasurer

21 28. It is the duty of a committee's treasurer – including a candidate who is acting as the
22 committee treasurer – to ensure that the committee complies with all the requirements of the Act.¹⁶

23 29. A committee's treasurer may be held jointly and severally liable, along with the
24 candidate and committee, for violations committed by the committee.¹⁷

25 ///

26 ¹² Section 84200.5, subdivision (a).

27 ¹³ Section 84200.8, subdivisions (a)-(b).

28 ¹⁴ Section 84200 (a).

¹⁵ Section 84211, subs. (a),(c) and (f)(5).

¹⁶ Sections 81004, 84100 and 84104, and Regulation 18427.

¹⁷ Sections 83116.5 and 91006 and Regulation 18316.6.

1 Liability for Violations

2 30. Any person who violates any provision of the Act is liable for administrative penalties up
3 to \$5,000 per violation.¹⁸

4 **GENERAL FACTS**

5 31. According to her Facebook profile, “Costa Mesa Citizen Sandy Genis,” Genis served on
6 the Costa Mesa City Council from 1988 to 1996 and was a former Mayor of Costa Mesa.¹⁹

7 32. Genis was again elected to Costa Mesa City Council in 2012 and re-elected during the
8 November 8, 2016 General Election.

9 33. Genis served on the City Council until the end of 2020, after unsuccessfully running for
10 Mayor during the November 6, 2018, and November 3, 2020 General Elections.

11 The 2016 Committee, Genis and Harmanos Violations

12 34. The 2016 Committee was Genis’s candidate-controlled committee for the 2016
13 campaign.

14 35. On February 9, 2015, the 2016 Committee filed an amendment to its statement of
15 organization with SOS to re-designate the committee from the 2012 election to the 2016 election.

16 36. During the 2016 election, the 2016 Committee raised and spent approximately \$13,590
17 in contributions and \$13,652 in expenditures.

18 37. The last statement the 2016 Committee filed was the semiannual statement covering the
19 period January 1, 2020 to June 30, 2020.

20 38. The statement was timely filed.

21 39. Prior to the filing covering January 1, 2020 to June 30, 2020, the statement covering the
22 period of July 1, 2019 to December 31, 2019 was filed 11 days late.

23 40. The 2016 Committee, Genis, and Harmanos were required to file subsequent campaign
24 statements with the City Clerk.

25 41. The following chart summarizes the 2016 Committee’s late filings and required
26 subsequent filings:

27 ///

28 ¹⁸ Sections 83116 and 83116.5.

¹⁹ https://www.facebook.com/SandyGenis4CostaMesa/about_details

Statement/Type	Reporting Period	Due Date	Date Filed
Semiannual	7/1/2019 – 12/31/2019	1/31/2020	2/11/2020 (late)
Semiannual	1/1/2020 – 6/30/2020 ²⁰	7/31/2020	7/30/2020 (timely)
Pre-Election ²¹	7/1/2020 – 9/19/2020	9/24/2020	Not Filed
Pre-Election ²²	9/20/2020 – 10/17/2020	10/22/2020	Not Filed
Semiannual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
Semiannual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
Semiannual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
Semiannual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semiannual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semiannual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semiannual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

42. To date, the 2016 Committee remains open and continues to have a filing obligation.

43. On November 7, 2018, the SOS referred the 2016 Committee to the Enforcement Division for failure to pay Annual Fees for 2016, 2017, and 2018.

44. The Enforcement Division made multiple attempts to obtain compliance regarding outstanding fees and campaign statements.

45. Enforcement Division staff sent multiple emails to Genis, on October 28, 2019; November 13, 2019; November 26, 2019; December 12, 2019; January 29, 2020; February 11, 2020 (Genis responded the same day that the outstanding statements were filed with the City Clerk); February 13, 2020; February 27, 2020; April 7, 2020; May 13, 2020; and June 10, 2020.

///

²⁰ The Committee reported an ending cash balance of \$1,093.75, \$0 contributions, and \$0 expenditures.

²¹ Since Genis was a candidate for Mayor on the November 3, 2020 General Election ballot, the 2016 Committee, Genis, and Harmanos were required to file the first pre-election campaign statement with the City Clerk by the September 24, 2020 deadline.

²² Since Genis was a candidate for Mayor on the November 3, 2020 General Election ballot, the 2016 Committee, Genis, and Harmanos were required to file the second pre-election campaign statement with the City Clerk by the October 22, 2020 deadline.

The 2018 Committee and Genis Violations

46. The 2018 Committee was Genis’s candidate-controlled committee for the 2018 campaign.

47. Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 6, 2018 General Election but continued to serve on the City Council through 2020. Genis served as the treasurer of the 2018 Committee.

48. Genis was a candidate for Mayor on the November 6, 2018 General Election ballot.

49. Therefore the 2018 Committee and Genis were required to file pre-election campaign statements with the City Clerk by the September 27, 2018 and October 25, 2018 deadlines.

50. The 2018 Committee filed the pre-election statements.

51. Following the pre-election statements, the last statement the 2018 Committee filed was the semiannual campaign statement covering October 21, 2018, through December 31, 2018. The 2018 Committee has failed to file any subsequent statements. The following subsequent campaign statements were required to be filed with the City Clerk:

Statement/Type	Reporting Period	Due Date	Date Filed
Semiannual	1/1/2019 – 6/30/2019	7/31/2019	Not Filed
Semiannual	7/1/2019 – 12/31/2019	1/31/2020	Not Filed
Semiannual	1/1/2020 – 6/30/2020	7/31/2020	Not Filed
Pre-Election ²³	7/1/2020 – 9/19/2020	9/24/2020	Not Filed
Pre-Election ²⁴	9/20/2020 – 10/17/2020	10/22/2020	Not Filed
Semiannual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
Semiannual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
Semiannual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed

²³ Since Genis was a candidate on the November 3, 2020 General Election ballot, the 2018 Committee was required to file the first pre-election campaign statement with the City Clerk by the September 24, 2020 deadline.

²⁴ Since Genis was a candidate on the November 3, 2020 General Election ballot, the 2018 Committee was required to file the second pre-election campaign statement with the City Clerk by the October 22, 2020 deadline.

Semiannual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
Semiannual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
Semiannual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
Semiannual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

52. To date, the 2018 Committee remains open and continues to have a filing obligation.

The 2020 Committee and Genis Violations

53. Genis was an unsuccessful candidate for Costa Mesa Mayor in the November 3, 2020 General Election and Genis’s term on the City Council ended in 2020.

54. The 2020 Committee filed an initial statement of organization with the SOS on August 24, 2020 and indicated it had not yet qualified. Genis served as the treasurer of the 2020 Committee.

55. Genis was a candidate for Mayor on the November 3, 2020 General Election ballot; therefore, the 2020 Committee and Genis were required to file pre-election campaign statements with the City Clerk by the September 24, 2020 and October 22, 2020 deadlines.

56. The 2020 Committee and Genis late-filed the first pre-election campaign statement on September 28, 2020 and reported \$6,763.99 in contributions and \$933.73 in expenditures.

57. According to the campaign statement, the Committee qualified on or around September 15, 2020.

58. Within 10 days of qualifying, the Committee was required to file an amendment to its statement of organization with the SOS to report its date of qualification but failed to do so.

59. After Genis failed to file the second pre-election campaign statement by the October 22, 2020 deadline, the City Clerk referred the 2020 Committee to the Enforcement Division.

60. The Enforcement Division made multiple attempts to obtain compliance. On October 26, 2020 and October 27, 2020, Enforcement Division staff made multiple phone calls, left voice messages, and sent emails.

61. During a phone call on October 26, 2020, Genis stated the second pre-election campaign statement was dropped off at the City Hall on October 26, 2020.

1 62. On October 26, 2020, the 2020 Committee and Genis filed the second pre-election
2 campaign statement with the City Clerk for the reporting period of September 20, 2020 through
3 October 17, 2020, and reported \$12,099 in contributions, \$8,186.60 in expenditures, and an ending
4 cash balance of \$9,742.

5 63. As of the date of this report, below is a chart detailing the 2020 Committee's late and
6 outstanding filings:

7

8 Statement/Type	Reporting Period	Due Date	Date Filed
9 Pre-election	7/1/2020 – 9/19/2020	9/24/2020	9/28/20 (late)
10 Pre-election	9/20/2020 – 10/17/2020	10/22/2020	10/26/2020 (late)
11 Semiannual	10/18/2020 – 12/31/2020	2/1/2021	Not Filed
12 Semiannual	1/1/2021 – 6/30/2021	8/2/2021	Not Filed
13 Semiannual	7/1/2021 – 12/31/2021	1/31/2022	Not Filed
14 Semiannual	1/1/2022 – 6/30/2022	8/1/2022	Not Filed
15 Semiannual	7/1/2022 – 12/31/2022	1/31/2023	Not Filed
16 Semiannual	1/1/2023 – 6/30/2023	7/31/2023	Not Filed
17 Semiannual	7/1/2023 – 12/31/2023	1/31/2024	Not Filed

18 64. Additionally, according to the 2020 Committee's pre-election campaign statement
19 covering the period of July 1, 2020 to September 19, 2020, Genis loaned the Committee \$3,815.99.

20 65. However, Genis failed to include the date on which the loan was incurred, as required by
21 the Act.

22 66. The failure to report the date prevented the Enforcement Division from determining
23 whether 24-Hour Contribution reports were required.

24 67. The City Clerk contacted Genis regarding outstanding statements for the 2016, 2018,
25 and 2020 Committees on January 25, 2021; February 2, 2021; February 4, 2021; and February 9,
26 2021.

27 68. After Genis failed to file the required campaign statements, the City Clerk made a
28 second referral to the Enforcement Division.

1 69. The Enforcement Division made multiple attempts to obtain compliance.

2 70. On August 31, 2022; September 8, 2022; September 28, 2022; and October 6, 2022 the
3 Enforcement Division made multiple phone calls and sent emails. Genis was unresponsive to these
4 contacts.

5 **PROCEDURAL HISTORY**

6 71. The Enforcement Division initiated an administrative action against Sandy Genis for Costa
7 Mesa City Council 2016, Sandy Genis for Costa Mesa Mayor 2019, Sandy Genis for Costa Mesa
8 Mayor 2020, Sandy Genis and Michael Harmanos in this matter by serving a packet containing a cover
9 letter, a Report in Support of a Finding of Probable Cause (“PC Report”), a fact sheet regarding
10 probable cause proceedings, selected sections of the Government Code regarding probable cause
11 proceedings for the Commission, and selected regulations of the Commission regarding probable
12 cause proceedings.

13 72. Genis was served with the PC Report, individually and on behalf of the three committees,
14 by certified mail, return receipt requested on April 5, 2024.

15 73. Harmos was served with the PC Report, individually and on behalf of the 2016 Committee
16 by certified mail, return receipt requested, on May 3, 2024.

17 74. The information contained in the PC Report packet advised Genis, Harmanos, the 2016
18 Committee, the 2018 Committee and the 2020 Committee that they had 21 days in which to request a
19 probable cause conference, file a written response to the PC Report, or both.

20 75. During the 21 days following the service of the PC Report, Genis, Harmanos, the 2016
21 Committee, the 2018 Committee, and the 2020 Committee did not file a response to the PC Report or
22 request a probable cause conference.

23 76. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
24 Accusation Be Prepared and Served (“Ex Parte Request”), dated June 6, 2024, the Enforcement
25 Division submitted the matter to the Hearing Officer for a determination of probable cause.

26 77. On or about June 11, 2024, the Hearing Officer issued an order finding, based on the Ex
27 Parte Request and the PC Report, that there was probable cause to believe Genis, Harmanos, the 2016
28 Committee, the 2018 Committee and the 2020 Committee violated the Act and directed the

1 Enforcement Division to issue an Accusation against Genis, Harmanos, the 2016 Committee, the 2018
2 Committee and the 2020 Committee in accordance with the finding.

3 **VIOLATIONS**

4 78. Genis, Harmanos, the 2016 Committee, the 2018 Committee and the 2020 Committee
5 committed thirty-three violations of the Act as follows:

6 **The 2016 Committee, Genis and Harmanos**

7 **Count 1**

8 **Failure to Timely File Semiannual Campaign Statement**

9 79. Complainant incorporates paragraphs 1 – 79 of this Accusation, as though completely set
10 forth here.

11 80. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
12 campaign statement for the reporting period of July 1, 2019 through December 31, 2019 by the
13 January 31, 2019 due date.

14 81. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
15 statement for the reporting period of July 1, 2019 through December 31, 2019 by the January 31,
16 2019 due date.

17 82. By failing to file the semiannual campaign statement by January 31, 2019, the 2016
18 Committee, Genis, and Harmanos violated Government Code Section 84200.

19 **Count 2**

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

21 83. Complainant incorporates paragraphs 1 – 83 of this Accusation, as though completely set
22 forth here.

23 84. The 2016 Committee, Genis, and Harmanos had a duty to timely file a pre-election
24 campaign statement for the reporting period of July 1, 2020 through September 19, 2020 by the
25 September 24, 2020 due date.

26 85. The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
27 statement for the reporting period of July 1, 2020, through September 19, 2020, by the September
28 24, 2020, due date.

1 86. By failing to file the pre-election campaign statement by September 24, 2020, the 2016
2 Committee, Genis, and Harmanos Government Code Sections 84200.5, subdivision (a) and 84200.8,
3 subdivision (b).

4 **Count 3**

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

6 87. Complainant incorporates paragraphs 1 – 87 of this Accusation, as though completely set
7 forth here.

8 88. The 2016 Committee, Genis, and Harmanos had a duty to timely file a pre-election
9 campaign statement for the reporting period of September 20, 2020 through October 17, 2020 by the
10 October 22, 2020 due date.

11 89. The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign
12 statement for the reporting period of September 20, 2020 through October 17, 2020 by the October
13 22, 2020 due date.

14 90. By failing to file the pre-election campaign statement by October 22, 2020, the 2016
15 Committee, Genis, and Harmanos violated Government Code Sections 84200.5, subdivision (a) and
16 84200.8, subdivision (b).

17 **Count 4**

18 **Failure to Timely File Semiannual Campaign Statement**

19 91. Complainant incorporates paragraphs 1 – 91 of this Accusation, as though completely set
20 forth here.

21 92. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
22 campaign statement for the reporting period of October 18, 2020 through December 31, 2020 by the
23 February 1, 2021 due date.

24 93. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
25 statement for the reporting period of October 18, 2020 through December 31, 2020 by the February
26 1, 2021 due date.

27 94. By failing to file the semiannual campaign statement by February 1, 2021, the 2016
28 Committee, Genis, and Harmanos violated Government Code Section 84200.

1 **Count 5**

2 **Failure to Timely File Semiannual Campaign Statement**

3 95. Complainant incorporates paragraphs 1 – 95 of this Accusation, as though completely set
4 forth here.

5 96. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
6 campaign statement for the reporting period of January 1, 2021 through June 30, 2021 by the August
7 2, 2021 due date.

8 97. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
9 statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021
10 due date.

11 98. By failing to file the semiannual campaign statement by August 2, 2021, the 2016
12 Committee, Genis, and Harmanos violated Government Code Section 84200.

13 **Count 6**

14 **Failure to Timely File Semiannual Campaign Statement**

15 99. Complainant incorporates paragraphs 1 – 99 of this Accusation, as though completely set
16 forth here.

17 100. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
18 campaign statement for the reporting period of July 1, 2021 through December 31, 2021 by the
19 January 31, 2022 due date.

20 101. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
21 statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31,
22 2022 due date.

23 102. By failing to file the semiannual campaign statement by January 31, 2022, the 2016
24 Committee, Genis, and Harmanos violated Government Code Section 84200.

25 **Count 7**

26 **Failure to Timely File Semiannual Campaign Statement**

27 103. Complainant incorporates paragraphs 1 – 103 of this Accusation, as though completely
28 set forth here.

1 104. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
2 campaign statement for the reporting period of January 1, 2022 through June 30, 2022 by the August
3 1, 2022 due date.

4 105. The 2016 Committee, Genis, and Harmanos failed to file a semiannual campaign
5 statement for the reporting period of January 1, 2022, through June 30, 2022, by the August 1, 2022,
6 due date.

7 106. By failing to file the semiannual campaign statement by August 1, 2022, the 2016
8 Committee, Genis, and Harmanos violated Government Code Section 84200.

9 **Count 8**

10 **Failure to Timely File Semiannual Campaign Statement**

11 107. Complainant incorporates paragraphs 1 – 107 of this Accusation, as though completely
12 set forth here.

13 108. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
14 campaign statement for the reporting period of July 1, 2022 through December 31, 2022 by the
15 January 31, 2023 due date.

16 109. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
17 statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31,
18 2023 due date.

19 110. By failing to file the semiannual campaign statement by January 31, 2023, the 2016
20 Committee, Genis, and Harmanos violated Government Code Section 84200.

21 **Count 9**

22 **Failure to Timely File Semiannual Campaign Statement**

23 111. Complainant incorporates paragraphs 1 – 111 of this Accusation, as though completely
24 set forth here.

25 112. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
26 campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July
27 31, 2023 due date.

28

1 113. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
2 statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due
3 date.

4 114. By failing to file the semiannual campaign statement by July 31, 2023, the 2016
5 Committee, Genis, and Harmanos violated Government Code Section 84200.

6 **Count 10**

7 **Failure to Timely File Semiannual Campaign Statement**

8 115. Complainant incorporates paragraphs 1 – 115 of this Accusation, as though completely
9 set forth here.

10 116. The 2016 Committee, Genis, and Harmanos had a duty to timely file a semiannual
11 campaign statement for the reporting period of July 1, 2023 through December 31, 2023 by the
12 January 31, 2024 due date.

13 117. The 2016 Committee, Genis, and Harmanos failed to timely file a semiannual campaign
14 statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31,
15 2024 due date.

16 118. By failing to file the semiannual campaign statement by January 31, 2024, the 2016
17 Committee, Genis, and Harmanos violated Government Code Section 84200.

18 **The 2018 Committee and Genis**

19 **Count 11**

20 **Failure to Timely File Semiannual Campaign Statement**

21 119. Complainant incorporates paragraphs 1 – 119 of this Accusation, as though completely
22 set forth here.

23 120. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
24 statement for the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due
25 date.

26 121. The 2018 Committee and Genis failed to timely file a semiannual campaign statement
27 for the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due date.
28

1 122. By failing to file the semiannual campaign statement by July 31, 2019, the 2018
2 Committee and Genis violated Government Code Section 84200.

3 **Count 12**

4 **Failure to Timely File Semiannual Campaign Statement**

5 123. Complainant incorporates paragraphs 1 – 123 of this Accusation, as though completely
6 set forth here.

7 124. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
8 statement for the reporting period of July 1, 2019 through December 21, 2019 by the January 31,
9 2020 due date.

10 125. The 2016 Committee and Genis failed to timely file a semiannual campaign statement
11 for the reporting period of July 1, 2019 through December 21, 2019 by the January 31, 2020 due
12 date.

13 126. By failing to file the semiannual campaign statement by January 31, 2020, the 2018
14 Committee and Genis violated Government Code Section 84200.

15 **Count 13**

16 **Failure to Timely File Semiannual Campaign Statement**

17 127. Complainant incorporates paragraphs 1 – 127 of this Accusation, as though completely
18 set forth here.

19 128. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
20 statement for the reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 due
21 date.

22 129. The 2018 Committee and Genis failed to timely file a semiannual campaign statement
23 for the reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 due date.

24 130. By failing to file the semiannual campaign statement by July 31, 2020, the 2018
25 Committee and Genis violated Government Code Section 84200.

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1 **Count 14**

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

3 131. Complainant incorporates paragraphs 1 – 132 of this Accusation, as though completely
4 set forth here.

5 132. The 2018 Committee and Genis had a duty to timely file a pre-election campaign
6 statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24,
7 2020 due date.

8 133. The 2016 Committee and Genis failed to timely file a pre-election campaign statement
9 for the reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 due
10 date.

11 134. By failing to file the pre-election campaign statement by September 24, 2020, the 2018
12 Committee and Genis violated Government Code Sections 84200.5, subdivision (a) and 84200.8,
13 subdivision (b).

14 **Count 15**

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

16 135. Complainant incorporates paragraphs 1 – 135 of this Accusation, as though completely
17 set forth here.

18 136. The 2018 Committee and Genis had a duty to timely file a pre-election campaign
19 statement for the reporting period of September 20, 2020 through October 17, 2020 by the October
20 22, 2020 due date.

21 137. The 2016 Committee and Genis failed to timely file a pre-election campaign statement
22 for the reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020
23 due date.

24 138. By failing to file the pre-election campaign statement by October 22, 2020, the 2018
25 Committee and Genis violated Government Code Sections 84200.5, subdivision (a) and 84200.8,
26 subdivision (b).

27 ///

28 ///

1 **Count 16**

2 **Failure to Timely File Semiannual Campaign Statement**

3 139. Complainant incorporates paragraphs 1 – 139 of this Accusation, as though completely
4 set forth here.

5 140. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
6 statement for the reporting period of October 18, 2020 through December 31, 2020 by the February
7 1, 2021 due date.

8 141. The 2018 Committee and Genis failed to timely file a semiannual campaign statement
9 for the reporting period of October 18, 2020 through December 31, 2020 by the February 1, 2021
10 due date.

11 142. By failing to file the semiannual campaign statement by February 1, 2021, the 2018
12 Committee and Genis violated Government Code Section 84200.

13 **Count 17**

14 **Failure to Timely File Semiannual Campaign Statement**

15 143. Complainant incorporates paragraphs 1 – 141 of this Accusation, as though completely
16 set forth here.

17 144. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
18 statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021
19 due date.

20 145. The 2018 Committee and Genis failed to timely file a semiannual campaign statement
21 for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 due date.

22 146. By failing to file the semiannual campaign statement by August 2, 2021, the 2018
23 Committee and Genis violated Government Code Section 84200.

24 **Count 18**

25 **Failure to Timely File Semiannual Campaign Statement**

26 147. Complainant incorporates paragraphs 1 – 147 of this Accusation, as though completely
27 set forth here.

1 148. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
2 statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31,
3 2022 due date.

4 149. The 2018 Committee and Genis failed to timely file a semiannual campaign statement
5 for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 due
6 date.

7 150. By failing to file the semiannual campaign statement by January 31, 2022, the 2018
8 Committee and Genis violated Government Code Section 84200.

9 **Count 19**

10 **Failure to Timely File Semiannual Campaign Statement**

11 151. Complainant incorporates paragraphs 1 – 151 of this Accusation, as though completely
12 set forth here.

13 152. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
14 statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022
15 due date.

16 153. The 2018 Committee and Genis failed to timely file a semiannual campaign statement
17 for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 due date.

18 154. By failing to file the semiannual campaign statement by August 1, 2022, the 2018
19 Committee and Genis violated Government Code Section 84200.

20 **Count 20**

21 **Failure to Timely File Semiannual Campaign Statement**

22 155. Complainant incorporates paragraphs 1 – 155 of this Accusation, as though completely
23 set forth here.

24 156. The 2018 Committee and Genis had a duty to timely file a semiannual campaign
25 statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31,
26 2023 deadline due date.

1 **2020 Committee and Genis**

2 **Count 23**

3 **Failure to Timely File Amendment to Statement of Organization**

4 167. Complainant incorporates paragraphs 1 – 167 of this Accusation, as though completely
5 set forth here.

6 168. The 2020 Committee and Genis had a duty to timely file an amended statement of
7 organization to report the 2020 Committee’s date of qualification of September 24, 2020, within 10
8 days of qualification.

9 169. The 2020 Committee and Genis failed to timely file an amended statement of
10 organization to report the Committee's date of qualification.

11 170. By failing to file an amended statement or organization, the 2020 Committee and Genis
12 violated Government Code Section 84101, subdivision (a).

13 **Count 24**

14 **Failure to Timely File Pre-Election Campaign Statement**

15 171. Complainant incorporates paragraphs 1 – 171 of this Accusation, as though completely
16 set forth here.

17 172. The 2020 Committee and Genis had a duty to timely file a pre-election campaign
18 statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24,
19 2020 due date.

20 173. The 2020 Committee and Genis failed to file a pre-election campaign statement for the
21 reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 due date.

22 174. By failing to file the pre-election campaign statement by September 24, 2020 the 2020
23 Committee and Genis violated Government Code Sections 84200.5 subdivision (a) and 84200.8,
24 subdivision (b).

25 **Count 25**

26 **Failure to Report Contributor Information**

27 175. Complainant incorporates paragraphs 1 – 175 of this Accusation, as though completely
28 set forth here.

1 176. The 2020 Committee and Genis had a duty to timely report all contributor information
2 for loans totaling \$3,815.99 on the pre-election campaign statement covering the period of July 1,
3 2020 through September 19, 2020, in violation of Government Code Section 84211.

4 177. The 2020 Committee and Genis failed to timely report all contributor information for
5 loans totaling \$3,815.99 on the pre-election campaign statement covering the period of July 1, 2020
6 through September 19, 2020, in violation of Government Code Section 84211.

7 178. By failing to timely report all contributor information, the 2020 Committee and Genis
8 violated Government Code Section 84211.

9 **Count 26**

10 **Failure to Timely File Pre-Election Campaign Statement**

11 179. Complainant incorporates paragraphs 1 – 179 of this Accusation, as though completely
12 set forth here.

13 180. The 2020 Committee and Genis had a duty to timely file a pre-election campaign
14 statement for the reporting period of September 20, 2020 through October 17, 2020 by the October
15 22, 2020 due date.

16 181. The 2020 Committee and Genis failed to file a pre-election campaign statement for the
17 reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 due date.

18 182. By failing to file the pre-election campaign statement by October 22, 2020, the 2020
19 Committee and Genis violated Government Code Sections 84200.5 subdivision (a) and 84200.8,
20 subdivision (b).

21 **Count 27**

22 **Failure to Timely File Semiannual Campaign Statement**

23 183. Complainant incorporates paragraphs 1 – 183 of this Accusation, as though completely
24 set forth here.

25 184. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
26 statement for the reporting period of October 18, 2020 through December 31, 2020, by the February
27 1, 2020, due date.
28

1 185. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
2 for the reporting period of October 18, 2020 through December 31, 2020, by the February 1, 2020,
3 due date.

4 186. By failing to file the semiannual campaign statement by February 1, 2020, the 2020
5 Committee and Genis violated Government Code Section 84200.

6 **Count 28**

7 **Failure to Timely File Semiannual Campaign Statement**

8 187. Complainant incorporates paragraphs 1 – 187 of this Accusation, as though completely
9 set forth here.

10 188. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
11 statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021
12 due date.

13 189. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
14 for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 due date.

15 190. By failing to file the semiannual campaign statement by August 2, 2021, the 2020
16 Committee and Genis violated Government Code Section 84200.

17 **Count 29**

18 **Failure to Timely File Semiannual Campaign Statement**

19 191. Complainant incorporates paragraphs 1 – 191 of this Accusation, as though completely
20 set forth here.

21 192. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
22 statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31,
23 2022 due date.

24 193. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
25 for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 due
26 date.

27 194. By failing to file the semiannual campaign statement by January 31, 2022, the 2020
28 Committee and Genis violated Government Code Section 84200.

1 **Count 30**

2 **Failure to Timely File Semiannual Campaign Statement**

3 195. Complainant incorporates paragraphs 1 – 195 of this Accusation, as though completely
4 set forth here.

5 196. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
6 statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022
7 due date.

8 197. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
9 for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 due date.

10 198. By failing to file the semiannual campaign statement by August 1, 2022, the 2020
11 Committee and Genis violated Government Code Section 84200.

12 **Count 31**

13 **Failure to Timely File Semiannual Campaign Statement**

14 199. Complainant incorporates paragraphs 1 – 199 of this Accusation, as though completely
15 set forth here.

16 200. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
17 statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31,
18 2023 due date.

19 201. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
20 for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 due
21 date.

22 202. By failing to file the semiannual campaign statement by January 31, 2023, the 2020
23 Committee and Genis violated Government Code Section 84200.

24 **Count 32**

25 **Failure to Timely File Semiannual Campaign Statement**

26 203. Complainant incorporates paragraphs 1 – 203 of this Accusation, as though completely
27 set forth here.
28

1 204. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
2 statement for the of reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023
3 due date.

4 205. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
5 for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due date.

6 206. By failing to file the semiannual campaign statement by July 31, 2023, the 2020
7 Committee and Genis violated Government Code Section 84200.

8 **Count 33**

9 **Failure to Timely File Semiannual Campaign Statement**

10 207. Complainant incorporates paragraphs 1 – 204 of this Accusation, as though completely
11 set forth here.

12 208. The 2020 Committee and Genis had a duty to timely file a semiannual campaign
13 statement for the reporting period of July 1, 2023 through December 31, 2023, by the January 31,
14 2024 due date.

15 209. The 2020 Committee and Genis failed to timely file a semiannual campaign statement
16 for the reporting period of July 1, 2023 through December 31, 2023, by the January 31, 2024 due
17 date.

18 210. By failing to file the semiannual campaign statement by January 31, 2024 the 2020
19 Committee and Genis violated Government Code Section 84200.

20 **MITIGATING OR EXCULPATORY FACTORS**

21 211. The Enforcement Division has no knowledge of any exculpatory information.

22 **AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS**

23 212. Genis has significant experience with the Act.

24 213. Genis served as a Costa Mesa City Councilmember at various times from 1988 to 2020
25 and should have been aware of the requirements of the Act.

26 214. Genis has a history of failing to timely file campaign statements, dating back to 2016.

27 215. Genis failed to terminate each of her controlled committees.

28 216. Therefore, each committee continues to have a filing obligation.

1 217. On February 11, 2020, Genis apologized for her poor response to Enforcement contact
2 due to personal issues.

3 218. Genis later provided additional details about a health-related problem in an email to
4 Enforcement on February 13, 2020.

5 **PRAYER**

6 WHEREFORE, Complainant prays as follows:

- 7 1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and
8 Regulation 18361.5, and at such hearing find that Grasha, the 2018 Committee, and the
9 2022 Committee violated the Act as alleged herein;
- 10 2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
12 for the violation of the Political Reform Act alleged in **Count 1**;
- 13 3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
15 for the violation of the Political Reform Act alleged in **Count 2**;
- 16 4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
17 the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000 for
18 the violation of the Political Reform Act alleged in **Count 3**;
- 19 5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
20 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
21 for the violation of the Political Reform Act alleged in **Count 4**;
- 22 6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
23 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
24 for the violation of the Political Reform Act alleged in **Count 5**;
- 25 7. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
26 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
27 for the violation of the Political Reform Act alleged in **Count 6**;

- 1 8. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
3 for the violation of the Political Reform Act alleged in **Count 7**;
- 4 9. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
6 for the violation of the Political Reform Act alleged in **Count 8**;
- 7 10. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
9 for the violation of the Political Reform Act alleged in **Count 9**;
- 10 11. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order the 2016 Committee, Genis, and Harmanos to pay a monetary penalty of up to \$5,000
12 for the violation of the Political Reform Act alleged in **Count 10**;
- 13 12. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
15 violation of the Political Reform Act alleged in **Count 11**;
- 16 13. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
17 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
18 violation of the Political Reform Act alleged in **Count 12**;
- 19 14. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
20 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
21 violation of the Political Reform Act alleged in **Count 13**;
- 22 15. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
23 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
24 violation of the Political Reform Act alleged in **Count 14**;
- 25 16. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
26 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
27 violation of the Political Reform Act alleged in **Count 15**;
- 28

- 1 17. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
3 violation of the Political Reform Act alleged in **Count 16**;
- 4 18. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
6 violation of the Political Reform Act alleged in **Count 17**;
- 7 19. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
9 violation of the Political Reform Act alleged in **Count 18**;
- 10 20. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
12 violation of the Political Reform Act alleged in **Count 19**;
- 13 21. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
15 violation of the Political Reform Act alleged in **Count 20**;
- 16 22. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
17 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
18 violation of the Political Reform Act alleged in **Count 21**;
- 19 23. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
20 order the 2018 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
21 violation of the Political Reform Act alleged in **Count 22**;
- 22 24. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
23 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
24 violation of the Political Reform Act alleged in **Count 23**;
- 25 25. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
26 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
27 violation of the Political Reform Act alleged in **Count 24**;
- 28


- 1 26. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
3 violation of the Political Reform Act alleged in **Count 25**;
- 4 27. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
6 violation of the Political Reform Act alleged in **Count 26**;
- 7 28. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
9 violation of the Political Reform Act alleged in **Count 27**;
- 10 29. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
12 violation of the Political Reform Act alleged in **Count 28**;
- 13 30. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
15 violation of the Political Reform Act alleged in **Count 29**;
- 16 31. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
17 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
18 violation of the Political Reform Act alleged in **Count 30**;
- 19 32. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
20 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
21 violation of the Political Reform Act alleged in **Count 31**;
- 22 33. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
23 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
24 violation of the Political Reform Act alleged in **Count 32**;
- 25 34. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
26 order the 2020 Committee and Genis to pay a monetary penalty of up to \$5,000 for the
27 violation of the Political Reform Act alleged in **Count 33**;
- 28

1 35. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
2 order the 2016 Committee, Harmanos, the 2018 Committee, the 2020 Committee, and Genis
3 to file all required statements and reports.

4 36. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision
5 (e), consider the following factors in framing a proposed order following a finding of a
6 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
7 by the specific violation; (2) The level of experience of the violator with the requirements
8 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
9 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
10 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
11 violator demonstrated good faith by consulting the Commission staff or any other
12 governmental agency in a manner not constituting complete defense under Government
13 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
14 whether the violator has a prior record of violations of the Political Reform Act or similar
15 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
16 amendments to provide full disclosure.

17 37. That the Fair Political Practices Commission grant such other and further relief as it deems
18 just and proper.

19
20 Dated: June 28, 2024



James M. Lindsay, Chief of Enforcement
Fair Political Practices Commission

Exhibit A-6

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 3050, Sacramento, California 95811.

On July 3, 2024, I served the following document(s):

1. Statement to Respondent;
2. FPPC Case No. 18/1359: Accusation;
3. Notice of Defense for Sandy Genis for Costa Mesa City Council 2016 (Two Copies);
4. Notice of Defense for Sandy Genis for Costa Mesa Mayor 2018 (Two Copies);
5. Notice of Defense for Sandy Genis for Costa Mesa Mayor 2020 (Two Copies);
6. 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 7:00 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

**Sandy Genis o/b/o
Sandy Genis for Costa Mesa City Council 2016
Sandy Genis for Costa Mesa Mayor 2018
Sandy Genis for Costa Mesa Mayor 2020
1586 Myrtlewood St.
Costa Mesa, CA 92626**

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 3, 2024.



Suzanna Gevorkyan

ATTORNEY OR PARTY WITHOUT ATTORNEY: Fair Political Practices Commission 1102 Q Street, Suite 3000 Sacramento, CA 95811 TELEPHONE NO.: (916) 322-8246 EMAIL ADDRESS: sgevorkyan@fppc.ca.gov ATTORNEY FOR:	FOR COURT USE ONLY
FAIR POLITICAL PRACTICES COMMISSION COURT OF CALIFORNIA STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PETITIONER: Fair Political Practices Commission RESPONDENT: In The Mater of: Sandy Genis for Costa Mesa City Council 2016, et al.	CASE NUMBER: 18/1359
PROOF OF SERVICE	Ref. No. or File No.:

1. I am over 18 years of age and not a party to this action.
2. Received by GSI to be served on **Sandy Genis o/b/o, 1586 Myrtlewood St, Costa Mesa, CA 92626.**
3. At the time of service I was at least 18 years of age and not a party to this action. I served copies of the Accusation
 - a. Party Served: Sandy Genis o/b/o
 - b. Person Served: Sandy Genis, .
 - c. Address: 1586 Myrtlewood St, Costa Mesa, CA 92626
(Abode)
4. Date and Time of service: 7/8/2024 at 1:30 pm
5. I am an independent contractor of a registered California process server.
6. My name, address, telephone number, and, if applicable, county of registration and number are:

Name: George Sano
 Firm: GSI
 Address: 360 E. 1st St., Suite 773, Tustin, CA 92780
 Telephone number: (714) 788-4860
 Registration Number: PSC2623
 County: Orange
 The fee for the service was: \$43.90
7. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 7-8-24

George Sano

(TYPE OR PRINT NAME OF PERSON WHO SERVED THE PAPERS)



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Fair Political Practices Commission 1102 Q Street, Suite 3000 Sacramento, CA 95811 TELEPHONE NO.: (916) 322-8246 EMAIL ADDRESS: sgevorkyan@fppc.ca.gov ATTORNEY FOR:	FOR COURT USE ONLY
FAIR POLITICAL PRACTICES COMMISSION COURT OF CALIFORNIA STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PETITIONER: Fair Political Practices Commission RESPONDENT: In The Mater of: Sandy Genis for Costa Mesa City Council 2016, et al.	CASE NUMBER: 18/1359
PROOF OF SERVICE	Ref. No. or File No.:

1. I am over 18 years of age and not a party to this action.
2. Received by GSI to be served on **Sandy Genis For Costa Mesa Mayor 2020, 1586 Myrtlewood St, Costa Mesa, CA 92626.**
3. At the time of service I was at least 18 years of age and not a party to this action. I served copies of the Accusation
 - a. Party Served: Sandy Genis For Costa Mesa Mayor 2020
 - b. Person Served: Sandy Genis, .
 - c. Address: 1586 Myrtlewood St, Costa Mesa, CA 92626
(Abode)
4. Date and Time of service: 7/8/2024 at 1:30 pm
5. I am an independent contractor of a registered California process server.
6. My name, address, telephone number, and, if applicable, county of registration and number are:

Name: George Sano
 Firm: GSI
 Address: 360 E. 1st St., Suite 773, Tustin, CA 92780
 Telephone number: (714) 788-4860
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7. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 7-8-24

George Sano

(TYPE OR PRINT NAME OF PERSON WHO SERVED THE PAPERS)



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

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PETITIONER: Fair Political Practices Commission RESPONDENT: In The Mater of: Sandy Genis for Costa Mesa City Council 2016, et al.	CASE NUMBER: 18/1359
PROOF OF SERVICE	Ref. No. or File No.:

1. I am over 18 years of age and not a party to this action.
2. Received by GSI to be served on **Sandy Genis For Costa Mesa Mayor 2018, 1586 Myrtlewood St, Costa Mesa, CA 92626.**
3. At the time of service I was at least 18 years of age and not a party to this action. I served copies of the Accusation
 - a. Party Served: Sandy Genis For Costa Mesa Mayor 2018
 - b. Person Served: Sandy Genis, .
 - c. Address: 1586 Myrtlewood St, Costa Mesa, CA 92626
(Abode)
4. Date and Time of service: 7/8/2024 at 1:30 pm
5. I am an independent contractor of a registered California process server.
6. My name, address, telephone number, and, if applicable, county of registration and number are:

Name: George Sano
 Firm: GSI
 Address: 360 E. 1st St., Suite 773, Tustin, CA 92780
 Telephone number: (714) 788-4860
 Registration Number: PSC2623
 County: Orange
 The fee for the service was: \$43.90
7. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 7-8-24

George Sano

(TYPE OR PRINT NAME OF PERSON WHO SERVED THE PAPERS)



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Fair Political Practices Commission 1102 Q Street, Suite 3000 Sacramento, CA 95811 TELEPHONE NO.: (916) 322-8246 EMAIL ADDRESS: sgevorkyan@fppc.ca.gov ATTORNEY FOR:	FOR COURT USE ONLY
FAIR POLITICAL PRACTICES COMMISSION COURT OF CALIFORNIA STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PETITIONER: Fair Political Practices Commission RESPONDENT: In The Mater of: Sandy Genis for Costa Mesa City Council 2016, et al.	CASE NUMBER: 18/1359
PROOF OF SERVICE	Ref. No. or File No.:

1. I am over 18 years of age and not a party to this action.
2. Received by GSI to be served on **Sandy Genis For Costa Mesa City Council 2016, 1586 Myrtlewood St, Costa Mesa, CA 92626.**
3. At the time of service I was at least 18 years of age and not a party to this action. I served copies of the Accusation
 - a. Party Served: Sandy Genis For Costa Mesa City Council 2016
 - b. Person Served: Sandy Genis, .
 - c. Address: 1586 Myrtlewood St, Costa Mesa, CA 92626
(Abode)
4. Date and Time of service: 7/8/2024 at 1:30 pm
5. I am an independent contractor of a registered California process server.
6. My name, address, telephone number, and, if applicable, county of registration and number are:

Name: George Sano
 Firm: GSI
 Address: 360 E. 1st St., Suite 773, Tustin, CA 92780
 Telephone number: (714) 788-4860
 Registration Number: PSC2623
 County: Orange
 The fee for the service was: \$81.40
7. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 7-8-24

George Sano

(TYPE OR PRINT NAME OF PERSON WHO SERVED THE PAPERS)



(SIGNATURE OF PERSON WHO SERVED THE PAPERS)

Exhibit A-7



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

STATEMENT TO RESPONDENT

[Government Code Section 11505, subdivision (b)]

***Sandy Genis for Costa Mesa City Council 2016, Sandy Genis for Costa Mesa Mayor 2018,
Sandy Genis for Costa Mesa Mayor 2020, Sandy Genis and Michael Harmanos
FPPC Case No. 18/1359***

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 Marissa Corona, Commission Counsel, Enforcement Division, at (279) 237-5932 or at mcorona@fppc.ca.gov.

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 (e)):

1. The extent and gravity of the public harm caused by the specific violation;
2. The level of experience of the violator with the requirements of the Political Reform Act;
3. Penalties previously imposed by the Commission in comparable cases;
4. The presence or absence of any intention to conceal, deceive or mislead;
5. Whether the violation was deliberate, negligent or inadvertent;
6. 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);
7. 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

8. Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.

Exhibit A-8

**Statement of Organization
Recipient Committee**

Type or print in ink

STATEMENT OF ORGANIZATION

Statement Type Initial
Not yet qualified or
_____/_____/_____
Date qualified as committee

Amendment
List I.D. number:
1348966
_____/_____/_____
Date qualified as committee
(if applicable)

Termination - See Part 5
List I.D. number:

_____/_____/_____
Date of Termination

Date Stamp

RECEIVED AND FILED
in the office of the Secretary of State
of the State of California

FEB 09 2015

CALIFORNIA FORM 410

For Official Use

FILED

MAR 10 2015

REGISTRAR OF VOTERS

1. Committee Information

NAME OF COMMITTEE
Sandy Genis for Costa Mesa City Council 2016

STREET ADDRESS (NO P.O. BOX)
173 E Wilson Street #C

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	CA	92627	949-351-5948

MAILING ADDRESS (IF DIFFERENT)

OPTIONAL: FAX / E-MAIL ADDRESS

COUNTY OF DOMICILE Orange	COUNTY WHERE COMMITTEE IS ACTIVE IF DIFFERENT THAN COUNTY OF DOMICILE
------------------------------	---

Attach additional information on appropriately labeled continuation sheets.

2. Treasurer and Other Principal Officers

NAME OF TREASURER
Michael Harmanos

STREET ADDRESS
173 E Wilson Street #C

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	CA	92627	949-351-5948

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE

NAME AND POSITION OF OTHER PRINCIPAL OFFICER(S), IF APPLICABLE

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE

RECEIVED
CITY CLERK
APR 05 2015
CITY OF COSTA MESA
BY SEM

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 Jan. 26, 2015
DATE

Executed on Jan. 30, 2015
DATE

Executed on _____
DATE

Executed on _____
DATE

By Michael S. Harmanos
SIGNATURE OF TREASURER OR ASSISTANT TREASURER

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

**Statement of Organization
Recipient Committee**

STATEMENT OF ORGANIZATION

**CALIFORNIA
FORM 410**

INSTRUCTIONS ON REVERSE

Page 2

COMMITTEE NAME

Sandy Genis for Costa Mesa City Council 2016

I.D. NUMBER

1348966

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 "non-partisan."
- 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
Sandra L. "Sandy" Genis	Costa Mesa City Council	2016	<input checked="" type="checkbox"/> Non-Partisan
			<input type="checkbox"/> Non-Partisan

- List the financial institution where the campaign bank account is located (controlled "candidate election" committees only)

NAME OF FINANCIAL INSTITUTION	AREA CODE/PHONE	BANK ACCOUNT NUMBER	
Union Bank - Costa Mesa #0277	714-557-1617	0011891660	
ADDRESS	CITY	STATE	ZIP CODE
PO Box 512380	Los Angeles	CA	90051

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

Exhibit A-9

**Recipient Committee
Campaign Statement
Cover Page**

COVER PAGE

RECEIVED
Date Stamp
CITY CLERK

20 FEB 11 AM 10:50

CITY OF COSTA MESA
BY _____

CALIFORNIA FORM **460**

Page 1 of 6

For Official Use Only

Statement covers period
from 10/23/2016
through 12/31/2016

Date of election if applicable:
(Month, Day, Year)
11/08/2016

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
<small>(Also Complete Part 5)</small> | <input type="checkbox"/> Sponsored
<small>(Also Complete Part 6)</small> |
| <input 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 checked="" type="checkbox"/> Amendment (Explain below)
Amend Schedule E; carry forward corrections to math errors
affecting totals | |

3. Committee Information

ID NUMBER

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa City Council 2016

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY STATE ZIP CODE AREA CODE/PHONE
Costa Mesa Ca. 92626 714-754-0803

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
Sandra L. Genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY STATE ZIP CODE AREA CODE/PHONE
Costa Mesa Ca. 92626 714-754-0803

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 Feb 2016
Date

Executed on _____
Date

Executed on _____
Date

Executed on _____
Date

By _____
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**

COVER PAGE - PART 2

CALIFORNIA FORM	460
Page <u>2</u> of <u>6</u>	

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE
Sandra L. "Sandy" Genis

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Costa Mesa City Council

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP
1586 Myrtlewood Street Costa Mesa CA 92627

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	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

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**

Amounts may be rounded
to whole dollars.

SUMMARY PAGE

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Sandy Genis for Costa Mesa City Council 2016

Statement covers period
from 10/23/2016
through 12/31/2016

CALIFORNIA FORM **460**

Page 3 of 6

I.D. NUMBER

1348966

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions..... Schedule A, Line 3	\$ 1288.00	\$ 13590.46
2. Loans Received..... Schedule B, Line 3		1425.00
3. SUBTOTAL CASH CONTRIBUTIONS..... Add Lines 1 + 2	\$ 1288.00	\$ 15015.46
4. Nonmonetary Contributions..... Schedule C, Line 3		
5. TOTAL CONTRIBUTIONS RECEIVED..... Add Lines 3 + 4	\$ 1288.00	\$ 15015.46

**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	\$ 4720.77	\$ 13652.69
7. Loans Made..... Schedule H, Line 3		
8. SUBTOTAL CASH PAYMENTS..... Add Lines 6 + 7	\$ 4720.77	\$ 13652.69
9. Accrued Expenses (Unpaid Bills)..... Schedule F, Line 3		
10. Nonmonetary Adjustment..... Schedule C, Line 3		
11. TOTAL EXPENDITURES MADE..... Add Lines 8 + 9 + 10	\$ 4720.77	\$ 13652.69

**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	\$ 5726.52
13. Cash Receipts..... Column A, Line 3 above	1288.88
14. Miscellaneous Increases to Cash..... Schedule I, Line 4	
15. Cash Payments..... Column A, Line 8 above	4720.77
16. ENDING CASH BALANCE..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ 2293.75

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	\$ 1425

Exhibit A-10

**Recipient Committee
Campaign Statement
Cover Page**

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Date Stamp

20 FEB 11 AM 10:45

CITY OF COSTA MESA
BY [REDACTED]

COVER PAGE

CALIFORNIA FORM **460**

Page 1 of 4

For Official Use Only

Statement covers period
from July 1, 2019
through Dec. 31, 2019

Date of election if applicable:
(Month, Day, Year)
2016

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

3. Committee Information

I.D. NUMBER
1348966

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa City Council 2016

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Costa Mesa</u>	<u>ca</u>	<u>92626</u>	<u>714-754-0803</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

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Costa Mesa</u>	<u>CA</u>	<u>92626</u>	<u>714-754-0803</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 10 Feb 2020
Date

By [REDACTED]
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

Exhibit A-11

**Recipient Committee
Campaign Statement
Cover Page**

COVER PAGE

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CITY CLERK
Date Stamp
JUL 30 PM 2: 52
CITY OF COSTA MESA

CALIFORNIA FORM 460

Page 1 of 4
For Official Use Only

Statement covers period
from jan 1, 2020
through june 30, 2020

Date of election if applicable:
(Month, Day, Year) november 2016

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

3. Committee Information

ID NUMBER
1348966

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa City Council 2016

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0803

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
Sandra L. Genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0803

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 July 30, 2020
Date

Executed on Aug 30, 2020
Date

Executed on _____
Date

Executed on _____
Date

By [Signature]
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

Exhibit A-12

**Recipient Committee
Campaign Statement
Cover Page**

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Date Stamp
CITY CLERK
18 SEP 28 AM 9:36
CITY OF COSTA MESA
BY [REDACTED]

CALIFORNIA FORM 460
Page 1 of 4
For Official Use Only

Statement covers period
from July 1, 2018
through Sept. 22, 2018

Date of election if applicable:
(Month, Day, Year)
Nov. 6, 2018

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

3. Committee Information

I.D. NUMBER
1410119

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa Mayor 2018

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY STATE ZIP CODE AREA CODE/PHONE
Costa Mesa Ca 92626 714-754-0814slg

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS
slgenis@aol.com

Treasurer(s)

NAME OF TREASURER
Sandra L. Genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY STATE ZIP CODE AREA CODE/PHONE
Costa Mesa CA 92626 714-754-0814

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS
slgenis@aol.com

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 25 Sept 2018
Date

Executed on 25 Sept 2018
Date

Executed on _____
Date

Executed on _____
Date

By _____
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**

COVER PAGE

RECEIVED CITY CLERK 8 OCT 25 PM 4:50 CITY OF COSTA MESA BY _____	CALIFORNIA FORM 460
	Page <u>1</u> of <u>7</u> <small>For Official Use Only</small>

Statement covers period from <u>9/23/18</u> through <u>10/20/18</u>	Date of election if applicable: (Month, Day, Year) <u>Nov. 6, 2018</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 | Primarily Formed Candidate/
Officeholder Committee
<small>(Also Complete Part 7)</small> |

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"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER
1410119

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Sandy Genis for Costa Mesa Mayor 2018

STREET ADDRESS (NO P.O. BOX)

1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0814

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS

sigenis@aol.com

Treasurer(s)

NAME OF TREASURER

sandra l. genis

MAILING ADDRESS

1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0814

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 10/25/18 Date
 Executed on 10/25/18 Date
 Executed on _____ Date
 Executed on _____ Date

By _____
 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

Exhibit A-13

**Recipient Committee
Campaign Statement
Cover Page**

COVER PAGE

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Date Stamp
CITY CLERK

9 AUG -6 PM 3:54

CITY OF COSTA MESA
BY _____

CALIFORNIA FORM 460

Page 1 of 4

For Official Use Only

Statement covers period
from 1/1/19
through 7/31/19

Date of election if applicable:
(Month, Day, Year)
Nov. 6, 2018

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="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 checked="" type="checkbox"/> Primarily Formed Candidate/Officeholder 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 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"/> Amendment (Explain below) | |

3. Committee Information

ID NUMBER
1410119

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa Mayor 2018

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Costa Mesa</u>	<u>Ca</u>	<u>92626</u>	<u>714-754-0814</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS

slgenis@aol.com

Treasurer(s)

NAME OF TREASURER
sandra l. genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Costa Mesa</u>	<u>Ca</u>	<u>92626</u>	<u>714-754-0814</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 10/16/2019
Date

Executed on _____
Date

Executed on _____
Date

Executed on _____
Date

By _____
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

Exhibit A-14

**Recipient Committee
Campaign Statement
Cover Page**

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Date Stamp
CITY CLERK
20 FEB 11 AM 10:43
CITY OF COSTA MESA
BY: [REDACTED]

CALIFORNIA FORM 460
Page 1 of 4
For Official Use Only

Statement covers period
from 7/1/19
through 12/31/19

Date of election if applicable:
(Month, Day, Year)
Nov. 6, 2018

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

3. Committee Information

I.D. NUMBER
1410119

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa Mayor 2018

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0803

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE

OPTIONAL FAX / E-MAIL ADDRESS
slgenis@aol.com

Treasurer(s)

NAME OF TREASURER
sandra l. genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0803

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 11 Feb 2020 Date

By [REDACTED] 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

Exhibit A-15

**Recipient Committee
Campaign Statement
Cover Page**

Date Stamp CITY CLE 20 JUL 30 PM 2:52 CITY OF COSTA MESA RY	CALIFORNIA FORM 460
	Page <u>1</u> of <u>4</u>
	For Official Use Only

Statement covers period from <u>Jan. 1, 2020</u> through <u>June 30, 2020</u>	Date of election if applicable: (Month, Day, Year) <u>Nov 2018</u>
---	--

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
<i>(Also Complete Part 5)</i> | <input type="checkbox"/> Primarily Formed Ballot Measure Committee
<input type="radio"/> Controlled
<input type="radio"/> Sponsored
<i>(Also Complete Part 6)</i> |
| <input type="checkbox"/> General Purpose Committee
<input type="radio"/> Sponsored
<input type="radio"/> Small Contributor Committee
<input type="radio"/> Political Party/Central Committee | <input checked="" 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 checked="" 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"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER
1410119

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for Costa Mesa Mayor 2020

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa CA	92626	Ca	92626 714-754-0803

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
Sandra L. Genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa CA	92626	Ca	92626 714-754-0803

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 July 30, 2020 Date
 Executed on July 30, 2020 Date
 Executed on _____ Date
 Executed on _____ Date

By [Signature] Signature of Treasurer or Assistant Treasurer
 By [Signature] 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

Exhibit A-16

Statement of Organization Recipient Committee

K 30
L
1430686

Statement Type

<input checked="" type="checkbox"/> Initial <input type="checkbox"/> Not yet qualified or <input type="checkbox"/> Date qualification threshold met _____/_____/_____	<input type="checkbox"/> Amendment Date qualification threshold met _____/_____/_____	<input type="checkbox"/> Termination - See Part 5 Date of termination _____/_____/_____
---	---	---

Date Stamp
RECEIVED AND FILED
 in the office of the Secretary of State of the State of California
AUG 24 2020

CALIFORNIA FORM 410
 For Official Use Only
 SEP 18 2020
 REGISTER OF VOTERS

1. Committee Information

I.D. Number
(if applicable)

NAME OF COMMITTEE

Sandy Genis for Costa Mesa Mayor 2020
 1586 Myrtlewood

STREET ADDRESS (NO P.O. BOX)

Costa Mesa Ca 92626
 CITY STATE ZIP CODE AREA CODE/PHONE
 714-754-0803

FULL MAILING ADDRESS (IF DIFFERENT)

E-MAIL ADDRESS (REQUIRED) / FAX (OPTIONAL)

sgenis@aol.com

COUNTY OF DOMICILE

Orange

JURISDICTION WHERE COMMITTEE IS ACTIVE

City of Costa Mesa

Attach additional information on appropriately labeled continuation sheets.

2. Treasurer and Other Principal Officers

NAME OF TREASURER

Sandra Genis

STREET ADDRESS (NO P.O. BOX)

1586 Myrtlewood, Costa Mesa, Ca 92626

CITY STATE ZIP CODE AREA CODE/PHONE

Costa Mesa Ca 92626 714-754-0803

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

NAME OF PRINCIPAL OFFICER(S)

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

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 17th 2020 By [Signature]
 DATE SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on 19th 2020 By [Signature]
 DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____ By _____
 DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____ By _____
 DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

RECEIVED
 CITY CLERK
 20 OCT -5 AM 10:05
 BY [Signature]
 CITY OF COSTA MESA

**Statement of Organization
Recipient Committee**

INSTRUCTIONS ON REVERSE

COMMITTEE NAME
Sandy Genis for Costa Mesa Mayor 2020

• All committees must list the financial institution where the campaign bank account is located.

NAME OF FINANCIAL INSTITUTION <i>Union Bank</i>	AREA CODE/PHONE <i>714-557-1617</i>	BANK ACCOUNT NUMBER <i>0012174678</i>
ADDRESS <i>1545 Adams</i>	CITY <i>Costa Mesa</i>	STATE <i>Ca.</i>
		ZIP CODE <i>92626</i>

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." Stating "No party preference" is acceptable.
- 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 CHECK ONE		
<i>Sandra L. Genis</i>	<i>Costa Mesa Mayor</i>	<i>2020</i>	Nonpartisan <input checked="" type="checkbox"/>	Partisan <input type="checkbox"/>	(list political party below)
			Nonpartisan <input type="checkbox"/>	Partisan <input type="checkbox"/>	(list political party below)

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) IF A RECALL, STATE "RECALL" IN FRONT OF THE OFFICEHOLDER'S NAME.	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

Page 3

I.D. NUMBER

COMMITTEE NAME

Sandy Gents for Costa Mesa Maya

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

AREA CODE/PHONE

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-17

**Recipient Committee
Campaign Statement
Cover Page**

COVER PAGE

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20 SEP 28 PM 4: 51
CITY OF COSTA MESA

CALIFORNIA FORM **460**

Page 1 of 9

For Official Use Only

Statement covers period
from 7/1/2020 ~~01/03/2020~~
through 9/19/2020

Date of election if applicable:
(Month, Day, Year) Nov 2020

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

3. Committee Information

ID NUMBER
1430686

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandra Genis for costa Mesa Mayor 2020

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0803

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
~~Sandra Genis~~ **Sandra Genis**

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Costa Mesa	Ca	92626	714-754-0803

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 25 Sep 2020
Date

Executed on 23 Sep 2020
Date

Executed on _____
Date

Executed on _____
Date

By _____
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**

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE
Sandra L. Genis

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Mayor, City of Costa Mesa

RESIDENTIAL/BUSINESS ADDRESS (NO AND STREET) CITY STATE ZIP
1586 Myrtlewood St. Costa Mesa CA 92626

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 Sandy Genis for Costa Mesa Mayor 2018	I.D. NUMBER 1410119
---	------------------------

NAME OF TREASURER <i>Sandra</i> Sandra Genis	CONTROLLED COMMITTEE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
--	--

COMMITTEE ADDRESS STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY STATE ZIP CODE AREA CODE/PHONE
Costa Mesa CA 92626 714-754-0803

COMMITTEE NAME Sandy Genis for Costa Mesa City Council 2016	I.D. NUMBER 1348966
--	------------------------

NAME OF TREASURER Sandra L. Genis	CONTROLLED COMMITTEE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
--------------------------------------	--

COMMITTEE ADDRESS STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY STATE ZIP CODE AREA CODE/PHONE
Costa Mesa CA 92626 714-754-0803

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**

Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>7/1/20</u> 8/03/2020	CALIFORNIA FORM 460
through <u>9/19/2020</u>	
Page <u>3</u> of <u>9</u>	I.D. NUMBER 1430686

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Sandy Genis for Costa Mesa Mayor 2020

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>2748</u>	\$ <u>2748</u>
2. Loans Received Schedule B, Line 3	\$ <u>3815.99</u>	\$ <u>3815.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS Add Lines 1 + 2	\$ <u>6563.99</u>	\$ <u>6563.99</u>
4. Nonmonetary Contributions Schedule C, Line 3	\$ <u>200</u>	\$ <u>200</u>
5. TOTAL CONTRIBUTIONS RECEIVED Add Lines 3 + 4	\$ <u>6763.99</u>	\$ <u>6763.99</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>933.73</u>	\$ <u>933.73</u>
7. Loans Made Schedule H, Line 3	\$ <u>0</u>	\$ <u>0</u>
8. SUBTOTAL CASH PAYMENTS Add Lines 6 + 7	\$ <u>0</u>	\$ <u>0</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>933.73</u>	\$ <u>933.73</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> </u> / <u> </u> / <u>65</u>	\$ _____
<u> </u> / <u> </u> / <u> </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>6763.99</u>
14. Miscellaneous Increases to Cash Schedule I, Line 4	\$ <u>0</u>
15. Cash Payments Column A, Line 8 above	\$ <u>933.73</u>
16. ENDING CASH BALANCE Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5830.26</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	\$ <u>0</u>
19. Outstanding Debts Add Line 2 + Line 9 in Column B above	\$ <u>3815.99</u>

**Schedule A
Monetary Contributions Received**

Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period from <u>7/1/20</u> 8/03/2020	CALIFORNIA FORM 460
through <u>9/19/2020</u>	
Page <u>4</u> of <u>9</u>	
I.D. NUMBER 1430686	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Sandy Genis for Costa Mesa Mayor 2020

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)
08/03/20	Sandy Genis for Costa Mesa Mayor 2018 1586 Myrtlewood, Costa Mesa Ca. 92626	<input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		800	800	800
08/10/20	Robin Leffler [REDACTED]	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Ret.	200	200	200
8/14/20	Richard Mehren [REDACTED]	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Ret.	150	150	150
8/31/20	Robert Taft [REDACTED]	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Owner, 420 Central 420 W. Central Santa Ana, Ca.	249	249	249
9/15/20	Robert Juneman [REDACTED]	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Ret.	1000	1000	1000

SUBTOTAL \$ 2399

Schedule A Summary

- Amount received this period – itemized monetary contributions.
(Include all Schedule A subtotals.)\$ 2649
- Amount received this period – unitemized monetary contributions of less than \$100\$ 99
- Total monetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.).....**TOTAL \$** 2748

*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**

Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period from <u>7/1/20</u> 8/03/2020	CALIFORNIA FORM 460
through <u>9/19/2020</u>	
Page <u>3</u> of <u>9</u>	
I D NUMBER 1430686	

NAME OF FILER

Sandy Genis for Costa Mesa Mayor 2020

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)
9/16/20	Janet Krochman [REDACTED]	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Owner, Janet Lee Krochman, CPA 3004 Deodar, Costa Mesa CA.92626	250	250	250
		<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 \$						

*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-18

**Recipient Committee
Campaign Statement
Cover Page**

COVER PAGE

CALIFORNIA FORM **460**

Page 1 of 10

For Official Use Only

Date Stamp
CITY CLERK
OCT 26 PM 5:33
CITY OF COSTA MESA

Statement covers period
from 9/20/2020
through 10/17/2020

Date of election if applicable:
(Month, Day, Year) NOV. 2020

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

3. Committee Information

I.D. NUMBER
1430686

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Sandy Genis for costa Mesa Mayor 2020

STREET ADDRESS (NO P.O. BOX)
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Costa Mesa</u>	<u>Ca</u>	<u>92626</u>	<u>714-754-0803</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
Sadra Genis

MAILING ADDRESS
1586 Myrtlewood St.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Costa Mesa</u>	<u>Ca</u>	<u>92626</u>	<u>714-754-0803</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 10/26/2020
Date

Executed on 10/26/2020
Date

Executed on _____
Date

Executed on _____
Date

By _____
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**

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE
Sandra L. Genis

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Mayor, City of Costa Mesa

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP
1586 Myrtlewood St. Costa Mesa CA 92626

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 Sandy Genis for Costa Mesa Mayor 2018	I.D. NUMBER 1410119
NAME OF TREASURER Sadra Genis	CONTROLLED COMMITTEE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
COMMITTEE ADDRESS 1586 Myrtlewood St.	STREET ADDRESS (NO P.O. BOX)
CITY Costa Mesa CA 92626	STATE ZIP CODE AREA CODE/PHONE 714-754-0803

COMMITTEE NAME Sandy Genis for osta Mesa City Council 2016	I.D. NUMBER 1348966
NAME OF TREASURER Sandra L. Genis	CONTROLLED COMMITTEE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
COMMITTEE ADDRESS 1586 Myrtlewood St.	STREET ADDRESS (NO P.O. BOX)
CITY Costa Mesa CA 92626	STATE ZIP CODE AREA CODE/PHONE 714-754-0803

6. Primarily Formed Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
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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

Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>9/20/2020</u>	CALIFORNIA FORM 460
through <u>10/17/2020</u>	
Page <u>3</u> of <u>10</u>	I.D. NUMBER 1430686

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Sandy Genis for Costa Mesa Mayor 2020

Contributions Received

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions <i>Schedule A, Line 3</i>	\$ <u>12,099</u>	\$ <u>14857</u>
2. Loans Received <i>Schedule B, Line 3</i>	\$ <u>0</u>	\$ <u>3815.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS <i>Add Lines 1 + 2</i>	\$ <u>12099</u>	\$ <u>18662.99</u>
4. Nonmonetary Contributions <i>Schedule C, Line 3</i>	\$ <u>0</u>	\$ <u>200</u>
5. TOTAL CONTRIBUTIONS RECEIVED <i>Add Lines 3 + 4</i>	\$ <u>12099</u>	\$ <u>18862.99</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 <i>Schedule E, Line 4</i>	\$ <u>8186.60</u>	\$ <u>9120.33</u>
7. Loans Made <i>Schedule H, Line 3</i>	\$ _____	\$ _____
8. SUBTOTAL CASH PAYMENTS <i>Add Lines 6 + 7</i>	\$ _____	\$ _____
9. Accrued Expenses (Unpaid Bills) <i>Schedule F, Line 3</i>	\$ _____	\$ _____
10. Nonmonetary Adjustment <i>Schedule C, Line 3</i>	\$ _____	\$ _____
11. TOTAL EXPENDITURES MADE <i>Add Lines 8 + 9 + 10</i>	\$ <u>8186.60</u>	\$ <u>9120.33</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
____/____/65	\$ _____
____/____/____	\$ _____

Current Cash Statement

12. Beginning Cash Balance <i>Previous Summary Page, Line 16</i>	\$ <u>5830.26</u>
13. Cash Receipts <i>Column A, Line 3 above</i>	\$ <u>12099</u>
14. Miscellaneous Increases to Cash <i>Schedule I, Line 4</i>	\$ _____
15. Cash Payments <i>Column A, Line 8 above</i>	\$ <u>8186.60</u>
16. ENDING CASH BALANCE <i>Add Lines 12 + 13 + 14, then subtract Line 15</i>	\$ <u>9742.66</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 <i>See instructions on reverse</i>	\$ _____
19. Outstanding Debts <i>Add Line 2 + Line 9 in Column B above</i>	\$ <u>3815.99</u>

Exhibit A-19



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street, Suite 3050 • Sacramento, CA 95811

October 1, 2024

Sandy Genis individually and o/b/o
Sandy Genis for Costa Mesa City Council 2016
Sandy Genis for Costa Mesa Mayor 2018
Sandy Genis for Costa Mesa Mayor 2020
1586 Myrtlewood St.
Costa Mesa, CA 92626

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC No. 2018-01359, In the Matter of Sandy Genis For Costa Mesa City Council 2016, Sandy Genis For Costa Mesa Mayor 2018, Sandy Genis For Costa Mesa Mayor 2020 and Sandy Genis

Dear Sandy Genis,

On July 8, 2024 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 will appear on the published agenda for the Commission’s public meeting on **October 17, 2024**. 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 **November 21, 2024** and impose an administrative penalty of \$68,000 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.

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 (279) 237-5932 or MCorona@fppc.ca.gov if you wish to enter into a settlement agreement to resolve this matter in its entirety.

¹ Government Code section 11505.

Sincerely,

Marissa Corona

Marissa Corona
Commission Counsel
Enforcement Division

Exhibit A-20



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street, Suite 3050 • Sacramento, CA 95811

October 24, 2024

Sandy Genis individually and o/b/o
Sandy Genis for Costa Mesa City Council 2016
Sandy Genis for Costa Mesa Mayor 2018
Sandy Genis for Costa Mesa Mayor 2020
1586 Myrtlewood St.
Costa Mesa, CA 92626

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC Case No. 2018-01359, In the Matter of Sandy Genis For Costa Mesa City Council 2016, Sandy Genis For Costa Mesa Mayor 2018, Sandy Genis For Costa Mesa Mayor 2020 and Sandy Genis

Dear Sandy Genis,

On July 8, 2024, 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 October 17, 2024. The Commission will be asked to adopt the default at its public meeting scheduled for **November 21, 2024** and impose an administrative penalty of \$68,000 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on November 21, 2024 is enclosed with this letter.

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.

///

¹ Government Code Section 11505.

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 November 21, 2024 meeting. Please contact me at (279) 237-5932 or MCorona@fppc.ca.gov if you wish to enter into a negotiated settlement.

Sincerely,

Marissa Corona

Marissa Corona
Commission Counsel
Enforcement Division

Enclosures: Default Decision and Order, Exhibit 1 and attachments