

# (Approved January 6, 2025) CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION MINUTES OF HEARING, Public Session Thursday, November 21, 2024 10:00 a.m.

Present: Chair Silver, Commissioner Baker, Commissioner Ortiz, Commissioner Wilson, and Commissioner Wood

**Executive Staff Present:** 

Galena West, Executive Director
James M. Lindsay, Chief of Enforcement
Dave Bainbridge, General Counsel
Shrdha Shah, Chief of Audits and Assistance
Jue Wang, PhD, Chief of Administration
Lindsey Nakano, Senior FPPC Legislative Counsel

Call to Order.

Chair Silver called the meeting to order at 10:00 a.m.

Public Comments for items not on the agenda.

Chair Silver expressed anticipation for public comment on AB1170 and gratitude for public participation.

A resident of Dixon expressed concern over city funds being allegedly misused to distribute brochures promote a sales tax increase. Chair Silver stated he was grateful for the comment and elaborated on FPPC efforts to monitor campaign spending.

John Loe gave public comment concerning the Sonoma Country Board of Supervisors. Chair Silver informed Mr. Loe that public comments related to Ms. Hopkins, a member of the Board of

Supervisors, should be given when the Commission reached agenda item Number Nine. Mr. Loe agreed and expressed a desire for increased oversight in Sonoma County elections.

A third commentor discussed issues with the Federal Reserve, nonprofits, media organizations and censorship.

### 1. Approval of Commission Meeting Minutes.

**MOTION:** To approve the October 2024 meeting minutes. Moved by Chair Silver, seconded by Commissioner Baker. Commissioners Ortiz and Wilson abstained. The motion passed 3-0.

### 2. Consent Calendar.

Commissioner Ortiz removed item number seven.

Commissioner Baker removed items number four, five and six.

Chair Silver removed item number twelve.

Commissioner Wilson removed item number nine.

Commissioner Wood removed item number three.

**MOTION:** To approve the consent calendar, consisting of agenda items eight, ten, eleven, thirteen, fourteen, fifteen, and sixteen. Moved by Commissioner Ortiz; seconded by Commissioner Wilson. The motion passed 5-0.

### 3. Adoption of the 2024/2025 Statement of Economic Interests, Form 700.

Chloe Hackert, Manager, Education and External Affairs Unit, Legal Division, presented an overview of the item. Forms and related documents have been revised to reflect relevant dates, filing deadlines, updated gift limit, and resulting changes from the passage of AB 1170.

Commissioner Wood inquired about a comment from Sylvia Lopez of Rohnert Park stating that these changes were difficult for them because of their contract with an E-disclosure group. Dave Bainbridge, General Counsel, responded that Commission staff were working to resolve issues related to the implementation of AB 1170. Ms. Hackert added that trainings had been posted on the FPPC website and that filing officer trainings would be held in December. Commissioner

Wilson asked whether videos of the recent trainings were posted on the website. Mr. Bainbridge responded that there were video trainings on how to complete Form 700 available online. Commissioner Wood asked whether other city officials had shared Ms. Lopez's concern about E-filing contracts at the previous interested persons meeting. Mr. Bainbridge answered that they had not.

**MOTION:** To adopt the 2024/2025 Statement of Economic Interests, Form 700. Moved by Commissioner Wood, seconded by Commissioner Ortiz. The motion passed 5-0.

### 4. Adoption of Proposed Form 463, Report of Security Expenses.

Ms. Hackert explained that the Form 463 would allow campaigns to disclose specified information documenting the threat or potential threat necessitating the expenditure of campaign funds for security purposes, as required by legislation effective September 22, 2024. Commissioner Baker asked how it would be reported if a threat against an individual is no longer active and the individual returns the security equipment to the campaign. Ms. Hackert responded that it would be reported on the Form 460. Commissioner Baker asked what the intent of including an amendment box was. Ms. Hackert responded that it was a procedural contingency to allow filers to update the Commission if necessary. Commissioner Baker asked what the plan was to educate filers on completing the new form. Ms. Hackert responded that announcements about the Form 463 would be included in the annual new law fact sheet, on the FPPC website, education newsletter, and in trainings for candidates and treasurers. Commissioner Baker then recommended that the language allowing filers to attach a police report "in lieu of" providing a description of a threat be changed to a mandatory description with optional accompanying police report. She noted that this change could decrease workload for FPPC staff and make the information more accessible to the public. Mr. Bainbridge noted that these forms were very

rarely filed as the number of threats against campaigns are low, and when they are filed, the FPPC uses them primarily for recordkeeping purposes and staff did not need to search through police reports. If the issue became burdensome in the future, he offered the option of changing the language.

Commissioner Ortiz inquired about the evaluative criteria used to determine what qualifies as a threat. Lindsey Nakano, Senior FPPC Legislative Counsel, responded that under prior law, filers needed to submit a police report. Now filers have more discretion and do not need to include a report but may do so under penalty of perjury.

Chair Silver reiterated Commissioner Baker's concern about the form's language and permittance of submitting police reports in lieu of incident descriptions and suggested that the form be amended to her recommendation.

Mr. Bainbridge noted that the aforementioned alteration would create the need for a language change in instructional documents as well.

Commissioner Wilson recommended adding an amendment to allow the Executive Director and Commission Chair to make technical changes without Commission approval.

**MOTION:** To approve specified changes. Moved by Chair Silver, seconded by Commissioner Wilson. The motion passed 5-0.

Later public comment, given after item #7: Eric Fraiser of Sonoma County expressed concern about public officials no longer being required to provide police reports in order to submit Form 463. He recommended re-implementing it in order to avoid slander and libel against private citizens being accused of harassing officials.

5. In the Matter of Newsom for Governor 2018 and Gavin Newsom; FPPC Nos. 21/299 and 21/644.

At the request of Commissioner Baker, James Lindsay, Chief of Enforcement, clarified that there were multiple subvendor payments that were not disclosed in a timely manner. Commissioner Baker responded that she thought the precise number of payments was critical to understanding the size and pattern of the violation. Mr. Lindsay answered that the vast majority of payments were on one statement and that the statement was amended prior to the election. Charges are typically brought based on the number of statements and not the number of violations.

Chair Silver asked Mr. Lindsay to further explain subvendor payments for the public's understanding. Mr. Lindsay said that if a campaign payment over \$500 is made to a subvendor it must be disclosed.

Commissioner Baker elaborated that the disclosure of subvendor payments decreases the likelihood of a campaign shielding the true amount of money they are paying to third parties. She added that in the future she would prefer to see full information on subvendor payments.

Commissioner Baker inquired about the precedent for not charging behested payments under \$25,000. Mr. Lindsay explained that the Enforcement Division's methodology was altered in this case due to the large size of relevant behested payments. In other similar cases, there is generally a \$1,500 per count fine and 1.5% fine on the amount paid, in this case that could not be applied because one behested payment was over 12 million dollars. With that methodology, the fine would have been over \$200,000, but there were only 18 late reports charged, which only allows for a maximum fine of \$90,000. As such, the methodology was altered.

Commissioner Baker expressed concern over whether low monetary amounts in undisclosed behested payments equaled a low public harm. She also voiced concern about the relevancy of listed comparable cases. Mr. Lindsay answered that there was an unstated comparable case, that there was no self-dealing in this case, and that this respondent had a huge number of behested

payments that were filed correctly, and that the violations make up a very small percentage of overall filings.

Commissioner Baker asked why the identities of the recipients did not weigh into this decision, as it had in comparable cases. Mr. Lindsay agreed that the payee identities were important and responded that they were reviewed in this case, but there was no cause for concern.

Commissioner Baker added that the comparable cases used for evaluating this case were not persuasive to her because they were based on clerical errors. Mr. Lindsay responded that there were issues in one comparable case in which there were significant reporting delays even after the principle was alerted, making it comparable.

Commissioner Baker voiced concern that subvendor payments were disclosed on the day of the election instead of in pre-election filings, decreasing public transparency. Mr. Lindsay responded that there were mitigating factors in this case, namely that the payments were in fact reported and that the violating reports were a very small percentage of the total reports.

Chair Silver emphasized his support for this decision and expanded upon a comparable case in which the respondent was fined a higher amount specifically because the public harm was egregious, whereas in this case the public harm was minimal and there was no evidence of personal benefit. Additionally, the respondent solicited advice from the Commission on how to best disclose payments, showing evidence of good faith efforts.

Commissioner Baker said that she understood the arguments but was not comfortable creating a precedent where behested payments at or under \$25,000 were not charged.

**MOTION:** To approve the item. Moved by Chair Silver, seconded by Commissioner Ortiz. The motion passed 4-1 (Commissioner Baker).

6. In the Matter of Steve Grasha for Mission Springs Water District 2018, Steve Grasha for Desert Water Agency 2022, and Steve Grasha; FPPC No. 18/1268.

Commissioner Wilson asked whether the fine was paid by Mr. Grasha or a campaign committee.

Mr. Lindsay answered that he was unsure, but believed it was primarily paid by Mr. Grasha.

Campaign committees are permitted to pay some FPPC fines.

**MOTION:** To approve the item. Moved by Commissioner Wood, seconded by Chair Silver. The motion passed 5-0.

### 7. In the Matter of Armando Jaramillo; FPPC No. 19/419.

Commissioner Ortiz asked how the Enforcement Division handles cases in which the respondent was not educated on what behavior is and is not permitted. Mr. Lindsay responded that while that was a mitigating factor in this case, the respondent's infraction was egregious and that the respondent made efforts to cover up his actions, indicating awareness that the behavior was questionable.

Chair Silver asked which local public officials are required to take conflict of interest training. Mr. Bainbridge responded that local agencies decide independently which of their employees take the trainings. Chair Silver stated that public officials who are not Form 700 filers may be subject to conflict-of-interest rules under 87100.

Commissioner Wilson asked if the fine would have been reduced if the respondent had cooperated with the investigation. Mr. Lindsay responded that in similar cases, fines and charges have been reduced after a respondent takes responsibility and cooperates.

Commissioner Baker asked why Section 87100 is not mentioned in this case, and why a higher number of counts were not charged. Mr. Lindsay responded that mitigating factors lowered the number of charges and that Sections 1090 and 87100 charges have never been separately charged for the same infraction.

**MOTION:** To approve the item. Moved by Chair Silver seconded by Commissioner Wood. The motion passed 5-0.

### 9. In the Matter of Lynda Hopkins; FPPC No. 22/207.

Commissioner Wilson asked why the fine was not higher in this conflict-of-interest case.

Mr. Lindsay summarized the case and that the behavior had been negligent, not malicious, allowing the fine to be lowered.

Commissioner Baker inquired about the timelines of adding the conflict-of-interest item to a meeting consent calendar as found in this case. Mr. Lindsay clarified that the conflict was not listed in the original consent calendar approved by the respondent but was included in the final version.

Chair Silver asked if the County Counsel informed the respondent that a potential conflict-ofinterest was on the agenda. Mr. Lindsay answered that she was not informed.

Chair Silver expressed that he was unsure if increasing the fine in this case was worth the administrative cost to the Enforcement Division but emphasized that conflict-of-interest fines in the future should be higher. Mr. Lindsay responded that this case had been open since 2019 and renegotiating the settlement would represent a massive procedural setback.

Chair Silver asked whether or not the grant which was a conflict-of-interest represented a significant public harm. Mr. Lindsay responded that the spouse who was employed by the recipient did not receive income from the exchange.

Commissioner Wood expressed concern over negotiations taking place at the end of the statute of limitations and approving low conflict-of-interest fines while simultaneously announcing that conflict-of-interest fines need to be prioritized. Chair Silver responded that the low fines are related to low-level infractions of conflict-of-interest law. Executive Director Galena West added that certain cases can be designated not to be used as comparable in future cases. Commissioner

Baker recommended not assigning any conflict-of-interest fines below \$3,500. Chair Silver proposed accepting the current fine amount, indicating that this case should not be used as a comparable in the future, and establishing as \$3,500 minimum fine in future conflict-of-interest cases.

**Public Comment:** A commenter discussed how he formerly served as a councilmember in the City of Dixon and was repeatedly informed by the City Attorney about potential conflicts of interest and was dismayed by the low fine in this case.

Chair Silver asked whether the Commission had the power to bar public officials for running for office under the Political Reform Act. Mr. Bainbridge responded that the law was unclear.

Commissioner Baker asked whether the Commission was limited as to how large a fine they could give respondents in conflict-of-interest cases. Ms. West responded that the limit was three times the benefit in a civil suit.

Commissioner Ortiz asked whether the fines were established by the Commissioner or the Legislature. Mr. Lindsay responded that the fines are set by law.

**Public Comment:** John Loe expressed disappointment at the low fine and concern about the political culture in Sonoma County. Another commenter called for Linda Hopkins to be removed from office and discussed political influence by third parties. Another commentor disclosed that she was the complainant in this case and requested that her written comment was included in this case file.

**Public Comment:** Eric Fraiser of Sonoma County alleged that the grant at issue in this case originated in the respondent's office and questioned the size of the fine.

Michael Hilburn of Sonoma County inquired about his written comment and discussed the influence of third parties on County politics.

**MOTION:** To approve the item as is but provide direction to the Enforcement Division to not include this case as a comparable and designate all future conflict of interest violations with a minimum \$3,500 fine. Moved by Chair Silver seconded by Commissioner Wilson. The motion passed 5-0.

12. In the Matter of AIDS Healthcare Foundation, Yes on 21 - Renters and Homeowners United to Keep Families in Their Homes, Sponsored by AIDS Healthcare Foundation, and Beverly Grossman Palmer; FPPC Nos. 20/338, 20/759, 20/760, & 20/818.

Chair Silver expressed concern with the proposed fine amount in this matter and recommended increasing it. He identified, among other things, the respondent's failure to disclose their grassroots lobbying activity until after being contacted by the FPPC and the public harm associated with that activity as the basis for raising the fine amount.

Chair Ortiz asked what mechanism the Commission could use to increase the fine amount.

Ms. West responded that the Commission could raise the fine amount or leave the issue to the Enforcement Division to either raise the fine amount or add counts.

Commissioner Baker expressed that she felt the consolidation of counts in this case was overbroad and that the penalty should be raised or the number of counts increased.

Chair Silver noted that the respondent had recently been fined by a local ethics commission for violations related to noncompliance with the jurisdiction's lobbying laws. Chair Silver recommended splitting one of the counts into four to represent the four quarters of the calendar year in which violations occurred.

Commissioner Baker noted that there are instances in which violators are not aware they have committed an infraction until they are contacted by the Fair Political Practices Commission.

Chair Silver agreed and added that in this case, the respondent was a lobbying firm and should have been aware of the relevant law.

Commissioner Ortiz added that she felt the violation was intentional.

Mr. Lindsay added that the high number of violations was correlated to the large size of the respondent's organization and that the amount of money received or spent by a respondent is not a factor in the adjudication of their violation.

**Public Comment:** Rand Martin of the AIDS Healthcare Foundation said that the Foundation values transparency and immediately corrected their violation when they were informed of the issue.

Chair Silver stated there are many organizations that engage in multi-million dollar ballot measure campaigns like respondent, and that he does not consider respondent's decision to not hire a compliance firm as an excuse for their noncompliance with the law.

Commissioner Baker asked for justification regarding the number of violations in relation to the number of counts charged.

Mr. Lindsay responded that the consolidation was standard, and the Enforcement Division levied the maximum or close to maximum fines for all counts.

Chair Silver asked whether the different types of report violations had ever been combined into one charge. Mr. Lindsay responded that he believed they had.

**Public Comment:** Beverly Grossman Palmer, Treasurer of Yes on 21, said that the reporting errors committed by AIDS Healthcare Foundation represented a fraction of their total activity and were largely related to non-monetary contributions, as such, they were difficult for the treasurer to track.

Chair Silver emphasized the importance of public disclosure in ballot measure activity.

**MOTION:** To reject the item, expand the lobbying activity counts to four, and split the 24-hour reporting from the count related to major donor reporting. Moved by Chair Silver seconded by Commissioner Wood. The motion passed 5-0.

## 17. Prenotice Discussion Biennial Cost of Living Adjustments (COLA) to Monetary Limits in the Political Reform Act.

Commissioner Wilson asked whether there were ever issues communicating the updated limits to local bodies. Mr. Bainbridge responded that there were not.

Commissioner Ortiz asked how local agencies without contribution limits are affected. Mr.

Bainbridge responded that local agencies who have not adopted their own code are subject to the State limits.

18. Adoption of Proposed Amendment of Regulation 18531.2; Refunding of General Election Contributions after Withdrawal of Candidate, and Amendment of Regulation 18537.1; Carry Over of Contributions.

Commissioner Baker asked whether there was any sign in Legislative debate or documentation that signified a preference for the *Brown* approach rather than the *Kaufman* approach in reference to carry over contributions.

Mr. Norton responded that there was no explanation for the Legislature's decision but a distinction was made suggesting the Commission should follow suit.

Commissioner Baker offered an alternative solution in which contributions could be retained with attribution to a future committee. Mr. Bainbridge responded that if the Legislature had intended for that alternative to be a possibility, they would not have included a distinction related to withdrawing candidacy after filing to appear on the ballot.

Commissioner Wilson asked if there was any significant indication of legislative intent and whether it would be possible to contact the legislature regarding their intent. Mr. Bainbridge responded that he did not remember any significant indication of intent in the record.

Chair Silver recommended adding a pre-notice for future regulatory updates. Mr. Bainbridge responded that there had been a pre-notice for this item in the past, but a second pre-notice could be added in the future.

Commissioner Wood asked if there was harm in holding the item for adoption until January to allow for additional public comment. Mr. Bainbridge responded that there was no serious harm but it would be helpful to have these amendments passed before the relevant regulations go into effect on January 1.

Commissioner Baker recommended not delaying the amendment to Regulation 18537.1 for logistical purposes, but noted that there was considerable public comment regarding the amendment to Regulation 18531.2, therefore, delaying its passage until January to allow for additional comment may be useful.

**MOTION:** To adopt the amendment to Regulation 18537.1 and to postpone adoption of the amendment to Regulation 18531.2. Moved by Commissioner Baker seconded by Commissioner Wood. The motion passed 5-0.

### 19. Adoption of Amendments to Regulation 18703, Public Generally Exception to Conflictof-Interest Prohibition

Commissioner Baker commented that there may be a scenario in which airport boards are voting to increase spending which would benefit themselves, but the public can vote them out of office. Commissioner Baker asked that the Commission revisit the issue in several years to review whether the amendments were effective.

**MOTION:** To adopt the amendment to Regulation 18703. Moved by Commissioner Ortiz seconded by Commissioner Wilson. The motion passed 5-0.

### 20. 2024/2025 Fiscal Year First Quarter Expenditure Report.

Chair Silver asked Ms. West what consequences she foresaw if the Commission were to lose nearly three million dollars in its budget. Ms. West responded that the loss would be impossible to absorb, especially considering that the majority of the budget is used for staff compensation. Ms. West also noted that there was a discrepancy in the reported number of vacancies between what the Department of Finance has and the FPPC reported that we are working out with them. Chief of Administration Dr. Jue Wang added that the \$2.8 million represented about 10% of the Commission's total budget.

Commissioner Wilson added that the Commission was in need of more staff and resources.

Commissioner Baker asked which roles were disputed vacancies. Ms. West responded that the roles weren't specified, but that the Department of Finance sought to cut the cost of any positions they determined to be vacant from the overall budget.

## 21. Summary of Data and Trends for Donor Advised Fund, Proceeding, and Relationship Disclosure.

Executive Researcher Cole Smith made a presentation.

Chair Silver asked for input on how to reach out to local officials who are using the new disclosure category. Commissioner Baker suggested working alongside the League of Cities and other associations to increase training on behested payments. Ms. West added that it is extremely difficult to track who is reporting and who needs to report, and information is not readily available.

Commissioner Baker asked how an individual can be the recipient of a behested payment. Mr. Smith responded that the report in question was completed with errors.

Commissioner Wilson asked what a designated contact person is, as specified in the Form 803.

Mr. Smith responded that it was likely the best possible contact for an official's office.

Commissioner Wilson noted that this would automatically be the treasurer of a campaign committee and asked what a comparable position is for behest payments. Mr. Smith responded that he was unsure. Commissioner Wilson agreed and noted that legislation to designate an official contact may increase transparency in issues of behested payments.

Commissioner Ortiz asked whether staff members organize behested payments and complete reports on behalf of elected officials. Commissioner Wilson responded that he assumed this was possible, as there was no designated staff member responsible. Ms. West responded that there were potential charges for aiding and abetting violations, but the elected official is most often the person held responsible.

Chair Silver clarified that if an elected official solicits a payment, and a new official comes into that position, the new official is not considered a recipient of the payment.

Commissioner Baker noted that if regulations are amended to add staff liability, staff may be hesitant to take such roles.

### 22. Legislative Update.

Commissioner Wood left the meeting at 3:39 pm.

Ms. Nakano gave an overview of PRA related legislation.

Amendment of PRA Sections Effective After the CAL-ACCESS Replacement System (CARS)

Becomes Operational

Chair Silver noted that multiple Commission staff members joined the California Political Treasurer's Association to speak to members about any FPPC related issues and address concerns regarding the Cal Access Replacement System.

Disclosure of Payments for Elected Official Travel (Form 807)

Commissioner Baker expressed her desire to make expanded lobbying travel payment disclosures a priority.

Sunset Extension – Authority to Enter Agreements to Enforce Local Campaign and Ethics Ordinances

Commissioner Wilson asked how providing support to local governments impacts Commission staff. Ms. West responded that the services are fiscally neutral. Commissioner Wilson noted that sunset dates in the bill which permits the Commission to contract with local governments could allow the Commission the leeway to reduce operations if budget cuts are implemented. Ms. West clarified that the Commission is not required to contract with local governments but is permitted to do so and may decline.

Clarification of Prohibition on Contributions to Ballot Measure Committee by Foreign Principals Chair Silver asked why the Legislature had not previously removed a loophole in state campaign finance law that allows foreign nationals to donate to campaigns if they are physically present in California. Ms. Nakano responded that the change was opposed by the American Civil Liberties Union, which cities first amendment and fourteenth amendment equal protection concerns. Chair Silver noted that it is the role of the Commission to advocate for transparency. Commissioner Baker added that this bill should be seen as unrelated to national conversations on immigration and that there was a potential for overwhelming consensus on the issue.

Require Disclosure of Arrangements for Prospective Employment

Chair Silver confirmed that there is no mechanism for disclosing arrangements for prospective employment for public officials.

Commissioner Baker expressed concern for public officials serving in small, part time, or volunteer roles who would be hesitant to disclose unrelated employment arrangements.

### 23. Executive Staff Reports.

Mr. Lindsay presented statistics on the large number of complaints received by the Enforcement Division during the 2024 election cycle, including an injunction against a State Senate candidate. Commissioner Baker asked that the next step in the injunction is. Mr. Lindsay replied that the injunction was granted, and the respondent was ordered to file by the date of the election. Commissioner Baker asked why the respondent's claim of a civil rights violation was not referred to the legal team. Ms. West responded that the claim was filed with the Attorney General's civil rights division. Commissioner Wilson asked whether a summary of the injunction was available. Mr. Lindsay said that could be arranged.

Audits & Assistance Division Chief Shrdha Shah stated that the Audit Division report had been submitted.

Commissioner Wilson noted that it was unreasonable for the Franchise Tax Board to claim they were unable to complete audits.

Commissioner Baker asked when the next draw for random audits was scheduled. Ms. Shah responded that it would be scheduled in the next few weeks.

Mr. Bainbridge presented statistics on the Legal Division's activities prior to the election.

Dr. Wang stated that the Administration and Technology Division report had been submitted.

Chair Silver welcomed new employees to the Commission staff.

Commissioner Baker asked for an update on website improvements. Dr. Wang responded that the improvements were scheduled to be completed by the end of the fiscal year. Commissioner Wilson expressed appreciation for the enhanced search functions and information downloading capabilities. Chair Silver added that a survey on website use was being circulated in order to

improve functionality. Commissioner Baker asked if the website update would address outdated advice letters.

### 24. Commissioner Comments and Proposed Future Agenda Items.

Commissioner Wilson asked that research be done into sales taxes being promoted at the local level via ballot measures in violation of mass mailing prohibitions. Commissioner Wilson recommended fining individual officials instead of cities who can easily absorb large fines in exchange for tax increases. Commissioner Baker agreed and added that the Commission should seek to further define the difference between campaign education and campaign advocacy. Commissioner Ortiz left the meeting at 4:14pm.

Commissioner Baker asked when to expect information on a question asked in a prior

Commission meeting regarding when it is permissible for campaigns to spend money on
reputation protection services. Mr. Bainbridge responded that he did not have a timeframe on
that project.

Chair Silver noted that the Commission received significant input that the public dislikes text messages from political campaigns and asked what, if anything, the Commission could do.

**MOTION:** To adjourn the meeting. Moved by Commissioner Baker, seconded by Chair Silver. The motion passed 3-0.

The meeting adjourned at 4:16 p.m.

Respectfully Submitted, Eva Hartman Executive Fellow Approved January 6, 2025

Adam E. Silver, Chair Fair Political Practices Commission