



(Approved February 13, 2025)  
**CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION**  
**MINUTES OF HEARING, Public Session**  
**Thursday, January 16, 2025**  
**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  
Shery Yang, Communications Director

**Call to Order.**

Chair Silver called the meeting to order at 10:03 a.m.

**1. Public Comments for items not on the agenda.**

George Barich from the City of Cotati expressed concern about the political climate in Cotati and in-kind contribution rules. A commentator from the City of Dixon advocated for restricting Political Reform Act violators from running for future public office. Laurie Alderman of the City of Cotati expressed concern over fair electoral processes and in-kind contributions. Steven Massey, Director of Technology Services for the San Francisco Ethics Commission, expressed concern over the implementation of AB 1170, which would require 87200 filers to file Form 700s only through the FPPC system. Don Garcia, Chief of the Conflict/Lobbyist

Division at the Los Angeles County Board of Supervisors Executive Office, advocated to extend the annual Form 700 deadline for filers affected by wildfires. Chair Silver responded that the filing deadline issue was not agendized today but was under consideration.

Additional relevant trainings and materials would be provided to affected filers.

Commissioner Baker recommended altering filing dates be added to the next agenda or addressed as soon as possible. General Counsel Dave Bainbridge stated that this could be addressed by an emergency regulation added to the March agenda for adoption by the Commission. Commissioner Wilson stated that the process should be expedited as much as possible. Commission Wood thanked Mr. Garcia and Mr. Bainbridge for their recommendations. Commissioner Baker asked that the March 3 deadline for some filers be considered in context of an emergency regulation. Chair Silver recommended that this issue be discussed during Item 12 and be agendized for a future meeting. Commissioner Wood asked whether the Commission could adopt a direct regulation and take public comment afterwards as the federal government does. Mr. Bainbridge responded that he did not believe that process was possible in California.

## **2. Approval of Commission Meeting Minutes.**

Commissioner Ortiz stated that her title was incorrectly written in Item 12 of the previous meeting minutes.

**MOTION:** To approve the November 2024 meeting minutes with Commissioner Ortiz's title corrected. Moved by Chair Silver, seconded by Commissioner Ortiz. The motion passed 5-0.

## **3. Consent Calendar.**

Commissioner Wilson removed item number 4.

**MOTION:** To approve the consent calendar items 3 and 5. Moved by Commissioner Ortiz; seconded by Commissioner Baker. The motion passed 5-0.

**4. In the Matter of Fernando Armenta and Noemi Armenta; FPPC No. 19/996.**

Commissioner Wilson asked James Lindsay, Enforcement Chief, to explain how the proposed penalty was decided for the benefit of the public. Mr. Lindsay responded that this was a significant misuse of campaign funds that extended over a period of two years and involved around \$15,000 worth of gifts given to the respondent's family members. Mr. Lindsay defined the case as a maximum penalty violation.

Commissioner Wilson added that the respondent had extensive experience in public office. Mr. Lindsay confirmed.

Commissioner Wilson asked whether the fine would be paid through personal or campaign funds. Mr. Lindsay responded that it would be paid through personal funds. Chair Silver asked for confirmation that, due to the nature of the violations, the fine could only be paid through personal funds. Mr. Lindsay confirmed.

Commissioner Ortiz asked for clarification on which family members who receive funds are considered when measuring the personal benefit gained by a violator. Mr. Lindsey responded that only those living within the violator's household are considered.

Commissioner Baker thanked Mr. Lindsay for levying the maximum penalty and noted that the case file was unclear on whether advice had been provided to the respondent. Mr.

Lindsay responded that the FPPC did not have evidence of giving advice to the respondent.

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

**6. In the Matter of Jeffrey Williams; FPPC No. 22/007.**

- 7. In the Matter of Damian Morgan; FPPC No. 22/075.** Mr. Lindsey stated that the pre-notice defaults were included in the agenda in an attempt to alert the respondents.

**8. Pre-Notice Discussion of Proposed Repeal and Amendment of Levine Act (Section 84308) Regulations and Related Regulations (18360.1, 18438.2-18438.8, 18705).**

Senior Commission Counsel Kevin Cornwall and Toren Lewis presented a regulation package adapting to recently enacted legislative changes to the Levine Act and related statutes.

Commissioner Baker asked whether changes to Section 18438.4 were based on recent amendments in statute or on the experience of the Legal Division providing advice. Mr. Cornwall responded that it was a clarification based on past advice letters authored by the Legal Division.

Commissioner Baker stated that she hoped for robust public comment on the change because it was not included in recent legislative updates, indicating that the Legislature did not intend to alter it. Commissioner Baker stated that altering the definition of “participant” in proceedings to not include some nonprofits, including labor, was significant. Mr. Cornwall explained that the Section defines a “participant” as a person, business entity, or nonprofit with a financial interest in the proceeding that does not qualify as a party of the proceeding. The Regulation change clarifies how to find applicable standards for evaluating financial interest.

Commissioner Baker asked how many questions the Legal Division has received on this issue. Mr. Cornwall responded that it was an infrequent topic, and most concerns were raised by labor unions in June 2023 when the Regulation was first adopted. Requests were made that labor unions not be defined as “participants” based on additional hours or wages gained by members because of the proceeding. The FPPC did not act on that request at that time, but

the issue is now resolved by the exception added to the definition of “participant” by the Legislature.

Commissioner Baker expressed concern over the potential for groups with significant contracts being considered in proceedings not being subject to the Levine Act. Mr. Cornwall responded that entities involved in contracts for consideration would qualify as parties to the proceeding, making them subject to Section 84308. Mr. Cornwall stated that finding a situation in which a proceeding has an indirect financial effect on a labor union is difficult.

Commissioner Baker presented a situation in which an entity’s labor contract is being considered by a board and entity members make public comment in favor of the contract. She asked whether the individuals giving public comment would be considered participants or parties to the proceedings, or only the entity to which they belong. Mr. Cornwall replied that the commentor’s status depended on whether they had a financial interest in the proceeding. Commissioner Baker confirmed that this was true regardless of whether an individual’s dues to the entity increased or decreased because of the proceeding. Mr. Cornwall responded that the language in Section 84308 related to organizations, not the personal financial effect on individuals.

Chair Silver stated that public comment was valuable to discover issues with regulations before they are implemented. Chair Silver clarified that this regulatory update was intended to provide a clear path for public officials to determine whether they qualify as a participant in a proceeding. Regulation 18702.3 allows entities to determine whether they meet thresholds for financial interest in a proceeding. Labor unions frequently fail to meet those thresholds.

Mr. Cornwall confirmed and added that it can be more difficult to determine financial interests when one is related to a proceeding as a participant rather than as a party. This Regulation is intended to direct officials to the relevant information.

Commissioner Wood confirmed that labor contracts are exempt from the regulations. She presented a scenario regarding a contract between a city and a developer who has a history of working with certain unions in which union members advocate for the adoption of the contract. Mr. Cornwall stated that two advice letters addressed similar issues. A contract fell outside of the bounds of a typical labor contract and union members advocating for the contract may have been considered participants. In this advice letter, the issue was rooted in whether the union members were participants, not whether the contract was exempt.

Commissioner Wood stated that disclosure was not mandated in those examples and asked Commissioner Baker if she thought that was an issue. Mr. Cornwall added that per Section 84308, parties are required to disclose contributions, but participants are not.

Commissioner Baker reiterated that this was an update to regulations based on the experience of the Legal Division. She asked the Legal Division to be aware of how these changes might exempt elected officials or participants who could have an interest in the outcome of a proceeding from the being held to the purpose of the Levine Act. She emphasized the importance of not changing the purpose of the statute. Mr. Cornwall replied that he viewed the changes as clarifications to applicable standards, as the statute directs that Section 87100 conflict of interest standards be used in these cases.

Commissioner Wilson asked what other contracts are exempted from the Statute and confirmed that contracts valued under \$50,000 are not applicable. Mr. Cornwall agreed.

Commissioner Ortiz asked why central committees are included in these regulations. Mr. Cornwall responded that the regulations apply to individuals running to be on the central committee, and that the Act expressly defines central committees as elected office.

Commissioner Ortiz asked how members of central committees could violate the Act. Mr. Cornwall responded that public officials have historically been members of one board while running for another public office and received a contribution while acting in their current capacity as a board member. In that scenario, the Act prohibits accepting campaign contributions while making a decision related to the contributor. Chair Silver clarified that in this case, that would pertain to candidates for a central committee receiving contributions while also holding another public office. Committees themselves cannot violate the Act. Mr. Bainbridge presented a scenario in which a city councilmember is running to be on a central committee when a developer approaches the city council with a development pending approval. The developer cannot, then, contribute to the councilmember's central committee campaign committee.

Mr. Lewis stated that the amendment to Regulation 18438.6 was to apply existing definitions, including that membership on a central committee was defined as an elected office.

Chair Silver asked why that type of candidate was not originally included in the Regulation.

Mr. Lewis responded that he was not sure. Chair Silver stated that examining the history related to the Regulation could clarify why central committees were not originally included.

Mr. Lewis stated that the amendment to Regulation 18438.2 removes definitions that were previously not codified in statute. The definitions are now codified by Section 84308.

Mr. Cornwall stated that amendments to Regulation 18438.4 clarify the applicability of standards found in Regulation 18702.3 and directs officials to the standards applicable to them.

Chair Silver asked why Regulation 18702.3 was chosen over other materiality standards for this analysis. Mr. Cornwall responded that this Regulation deals with determining the materiality of a financial effect on an individual's source of income. The Regulation also contains broad standards for determining when business entities and nonprofits are materially affected by a decision.

Mr. Lewis stated that proposed amendments to Regulation 18360.1 reflect changes in dollar amount required to qualify for FPPC programs including streamline, warning letters, and the Political Reform Education Program (PREP). Chair Silver asked if this was one of the areas where streamline enforcement is appropriate since they are conflict of interest cases.

Executive Director Galena West responded that it was, in addition to failure to recuse cases.

Chair Silver stated that he felt that conflict of interest violations are some the most egregious violations of the Act and questioned whether it was an appropriate violation to consider under streamline regulations. He asked that tighter standards be considered for allowing these cases to undergo streamline enforcement. Ms. West responded that the Legal and

Enforcement Divisions would be working in the future to review the appropriate standards.

Commissioner Wilson stated that he would need to be strongly convinced that Section 84308 violations could be streamlined. Ms. West stated that providing example situations to the Commission could benefit the Commission in their analysis.

Commissioner Baker agreed with Commissioner Wilson's concerns and asked Ms. West to elaborate on when recusal cases qualify for streamline enforcement. Ms. West stated that



recusal cases were streamlined when the official recused themselves from a proceeding, but made technical errors related to leaving the room or making correct announcements.

Commissioner Baker asked that the Commission evaluate streamlining conflict of interest cases in the future and set strict standards of when streamlining is appropriate.

Mr. Lewis stated that proposed amendments to Regulation 18705 updated the dollar amounts in line with changes to Section 84308.

Chair Silver asked which proposals are up to the Commission's discretion and which are necessitated by statute. Mr. Lewis responded that removing definitions in Regulation 18438.3 was necessary by statute but clarifying when an agency proceeding also qualifies as a development for use proceeding was at the Commission's discretion. The repeal of Regulation 18438.3 is necessary by statute. Mr. Cornwall stated that the application of conflict of interest standards in Regulation 18438.4 is theoretically at the Commission's discretion, however, these standards are consistent with past treatment of cases and most relevant to the statute. Regulation 18438.5 removes references to agents in line with changes to statute. Mr. Lewis stated that amendments to Regulation 18438.6 are discussed in advice letters but are deeply rooted in statute and reflect the Political Reform Act. Mr. Cornwall stated that amendments to Regulation 18438.7 are at the Commission's discretion but use standards already enforced elsewhere, making the amendment efficient. The language in amendments to Regulation 18438.8 is at the Commission's discretion but the general broadening of disclosure standards is necessitated by statute. Mr. Lewis stated that amendments to Regulations 18360.1 and 18705 regarding dollar amounts are necessitated by statute but eligibility requirements for FPPC programs is at the Commission's discretion.

Chair Silver asked the Legal Division to contact cities and counties who are most impacted by these proposed amendments to inform them of our proposals and solicit public comment.

Commission Baker asked if the amendment to Regulation 18438.8 would allow public officials who have received contributions to influence decision making bodies before the 30-day deadline for disclosure is enforced. Mr. Cornwall responded that this issue was resolved in part by amendments to Regulation 18304.7 by clarifying when officers know or should have known about contributions.

Commissioner Wilson asked what feedback has been received about the changes to Section 84308. Mr. Cornwall responded that educational materials and trainings have been made available, with about 100 participants attending each bimonthly training.

Commissioner Wilson asked about a scenario in which a legal counsel gives a city official incorrect advice on following the regulations. Ms. West responded that would be taken into consideration during enforcement actions. Mr. Bainbridge added that he received more feedback about the changes to Section 83408 than any other matter in his tenure at the FPPC.

**Public Comment:** Aleena Kasparian, Project Director of Executive Office of the Los Angeles County Board of Supervisors, stated that several definitions in the amendments were still unclear.

**9. Adoption of Proposed Amendment of Regulation 18531.2; Refunding of General Election Contributions after Withdrawal of a Candidate.**

Chair Silver stated that a comment letter stated that the Legislature had requested the Commission to not adopt this item and asked Senior Commission Counsel Zachary Norton to explain the item.

Chair Silver stated that he believed the key consideration was reliable clarity on these rules, and noted that if adopted, the Legislature could pass a law contradicting the amendment, further obscuring proper conduct.

Commissioner Wilson stated that he read the analysis on SB 948 and found that moving forward on this action could lead to conflict as there was no opposition to the bill.

Commissioner Wilson stated that the Commission may be overstepping its authority as a regulatory body if it passes this amendment in conflict with the Legislature. He stated that he is opposed to the proposal on the issue of the Commission's role as a regulatory body, not on the merits of the amendment.

Commissioner Baker agreed that it was best to not adopt the amendment in conflict with the Legislature. She stated that the Commission should not pivot to a different position on the issue because the Legislature indicated their intent, but rather recognize the practical reality that this Regulation will be reversed. Commissioner Baker recommended waiting until the end of the session to see if the Legislature passes a bill codifying their intent before considering this amendment. Because there are very few elections in the coming year, the likelihood of this issue arising is extremely narrow, creating an opportunity to approach the Legislature to codify their opinion instead of rebutting the Commission.

Commissioner Ortiz agreed and asked if the Commission was hoping that the Legislature would offer further clarification in future sessions. Mr. Norton responded that Commissioner Baker's approach allowed the Legislature to provide that clarification through codifying their intent. Chair Silver agreed to seek clarification through Legislation.

Commissioner Baker recommended postponing adoption until the September Commission meeting, before the Legislative session concludes, to indicate that the Commission has given lawmakers time to act and that the Commission is ready to adopt the proposal if they do not. Chair Silver emphasized that Commissioner Wilson's question of lawmaking authority also needs to be addressed. Commissioner Wilson stated that the Commission needed to be careful not to overstep its authority. Mr. Norton stated that it is the Legal Division's standpoint that the Commission does have the authority to enact this amendment, and if the item is held until September, he could add material to his presentation on the scope of the Commission's authority.

#### **10. Legislative Update.**

Senior FPPC Legislative Counsel Lindsey Nakano presented the update.

##### *Disclosure of Arrangement for Prospective Employment by Public Officials*

Chair Silver stated that he thought this was an extremely important type of disclosure, but it should be tailored to many of the scenarios Commissioner Baker raised at the November Commission meeting. He stated that perhaps only elected or state officials would need to disclose.

Commissioner Baker asked whether this information would normally be disclosed on Leaving Office statements. Ms. Nakano stated that it is not. Commissioner Baker asked for clarification on the use of those statements as relevant to this bill. Ms. Nakano stated that Statements of Economic Interests could be a mechanism for disclosing prospective employment information in the future. Commissioner Baker stated that including appointed officers in this category could have merit. Commissioner Baker confirmed that the Leaving

Office statement is due 30 days after leaving office, as opposed to Annual statements. Chair Silver clarified that the Form 700 is the proposed vehicle for this new disclosure, and officials would disclose prospective employment on the Annual or Leaving Office statement, whichever needs to be filed earlier.

Commissioner Baker stated that defining which appointed roles would qualify would require robust conversation.

Chair Silver asked if it was possible to discuss the item at the February Commission meeting. Ms. Nakano stated that waiting until February would put the FPPC in a difficult position due to legislative deadlines. Chair Silver recommended searching for authors interested in the general scope of this legislation and continuing to discuss the issue with the Commission and the author.

Commissioner Wilson asked that Ms. Nakano be in close contact with legislative leadership and committee chairs to confirm that the bill will have wider traction. Ms. Nakano confirmed that she is always in close communication with the Elections Committees.

Chair Silver asked whether any authors had been confirmed for FPPC bills. Ms. Nakano responded that legislators were still making final decisions and that their bill limit had been reduced from 50 to 35. She stated that February 21 is the last day for bills to be introduced but using spot bills and placeholder bills is an option.

## **11. Executive Staff Reports.**

Mr. Lindsay presented the Enforcement Division Executive Staff Report and the Policy Directives Progress Report.

Commissioner Wilson asked how many fewer cases are being processed. Mr. Lindsay responded that streamlining and PREP have greatly decreased the number of cases being processed through the Enforcement Division's mainline stipulations. Commissioner Wilson asked for a presentation on the streamline process in the future.

Chair Silver asked Mr. Lindsay to elaborate for the public on how to further reduce case times. Mr. Lindsay stated that additional staff would aid the Enforcement Division, but current staff are continuing to close cases and caseload will reduce in the coming year, especially because it is not an election year.

Commissioner Baker asked what changes had been made during the intake process to evaluate whether a case should be opened. Mr. Lindsay responded that intake had been restructured, staff were evaluating whether the complaints were sufficient under the Act, and that attorneys had been added to intake staff to vet the legal issues in cases before they are opened. Referrals have been reduced due to an increase in staff.

Commissioner Baker asked if cases are not opened because evidence is found during intake that a violation was not committed, or if attorneys do not believe they have ample evidence to prosecute. Mr. Lindsay responded that both scenarios occur, and most cases that are not opened involve scenarios in which potential violations do not qualify under the Political Reform Act. If a case is under a time pressure or is unclear, it will be opened instead of dismissed. Commissioner Baker stated that most people filing complaints are not attorneys and do not have a strong grasp of the law or what evidence may be necessary to open a case, and asked how the Enforcement Division handles that. Mr. Lindsay responded that the Enforcement Division looks beyond the initial complaint to investigate violations and has opened cases based on evidence not mentioned in the complaint. The Enforcement Division

does not expect all members of the public to be lawyers. Cases with no evidentiary support in the complaint or public filings will not be opened.

Commissioner Ortiz asked how complaints and referrals are received. Mr. Lindsay responded that complaints are sent by members of the public through the online portal, and referrals are sent by filing officers.

Commissioner Baker asked if for clarification if the intake unit was handling mainline or streamline stipulations. Mr. Lindsay replied that the intake unit had opened two mainline stipulations, but typically handled streamline violations. Senior intake attorneys may handle non-streamline cases.

Commissioner Baker asked what Mr. Lindsay has done as Enforcement Chief to ensure that warning letters are not being issued instead of prosecuting cases.

Mr. Lindsay responded that he received 10-15 matters each day for final approval and that he has a very strong grasp on why each case receives its result. The Enforcement Division's warning letter percentage decreased in the last year. When a situation merits monetary penalty, the Enforcement Division pursues that.

Commissioner Baker asked if Mr. Lindsay has deadlines for himself for when he receives matters, as previous feedback had stated that matters are halted between different teams.

Mr. Lindsay responded that his philosophy is to prioritize work that allows others to get their work done.

Commissioner Wilson presented a scenario in which the Enforcement Division receives 10 cases, in which half relate to public officials and half relate to staff filers. He asked if the Enforcement Division prioritizes potentially higher-profile cases.

Mr. Lindsay responded that matters relating to public officials are generally treated with priority, but serious violations will always be their focus.

Commissioner Ortiz left the meeting at 1:22pm.

Chair Silver stated that a warning letter is a finding of a violation, despite the fact that it has the connotation of a “warning,” it is a serious finding. Mr. Lindsay agreed and added that respondents can dispute the findings in warning letters. Chair Silver asked if it is a reasonable expectation that the number of warning letters will decrease in the next year. Mr. Lindsay responded that the number of warning letters was dependent on the types of cases and referrals received in the next year. Chair Silver stated that he expected and hoped the number would be lowered. Commissioner Wilson asked Chair Silver to elaborate on his rationale for the public. Chair Silver responded that the Enforcement Division is following the directives given to them by the Commission, and additional discretion was provided for certain case resolutions that has since expired. As such, the number of cases resolved via warning letter should be lower than it had been in the past because the Division no longer has that discretion. Mr. Lindsay responded that warning letters are an appropriate option in being able to close cases. If a significant change is made in how warning letters are used, the number of cases will increase. Commissioner Wilson asked who makes the decision to issue a warning letter. Mr. Lindsay responded that streamline standards often set when warning letters are appropriate and comparable past cases may be used. The Enforcement Chief has the final say on when letters are sent, as guided by expectations of when letters are appropriate set by the Executive Director and Commission. Ms. West added that warning letter criteria has already been added to regulation by the Commission.



Commissioner Baker stated that there was a warning letter in the past year that she had concerns about and confirmed that Commissioners can raise concerns with the Executive Director. She welcomed feedback on the discretion the Enforcement Division received previously in order to evaluate what is appropriate in the future under the new Commission. Chair Silver stated that he agreed, and members of the upcoming Commission could arrive with new priorities.

Commissioner Baker congratulated the Enforcement Division on their accomplishments and asked about the drop in the number of mainline stipulations. Mr. Lindsay responded that the streamline regulations have significantly reduced the number of mainline cases, and that nearly all streamline cases would have been mainlined in the past. Commissioner Baker asked what role discretion has played in that phenomenon. Mr. Lindsay responded that there is no discretion in determining what qualifies for streamline cases. Commissioner Baker asked if there is any discretion by the Enforcement Division or Executive Director to move a case to streamline that would not otherwise qualify. Ms. West responded that staff has no discretion and stated that the results Commissioners are seeing was the intent of the streamline program and has freed up resources to use on other cases. Mr. Lindsay stated that there were also more low-level streamline cases in the past, which have been replaced by the PREP program. Commissioner Baker asked about Enforcement Division morale. Mr. Lindsay responded that morale is great and higher than when he joined the Division. He stated that he spends almost no time on internal complaints. Commissioner Baker asked about newspaper articles that had been published on the length of time needed to prosecute FPPC cases, and if Mr. Lindsay had a response to that coverage. Mr. Lindsay responded that he thought the information in the articles was old news and that the Enforcement Division

was moving through cases expeditiously. Commissioner Baker asked about the goals set by previous guidance and the Division's future goals. Mr. Lindsay responded that the Division is on the path to meeting case reduction goals and expect to hit around 625 cases in the coming year, though the appropriate number of cases for the Division to handle is up for debate. Commissioner Wilson agreed that newspaper articles were not accurate and asked to be presented with more historical overviews of the Division's progress to better inform the public and future commissioners.

Audits and Assistance Division Chief Shrdha Shah stated that her report is submitted and that she will be reporting on their discretionary audit on Form 807 next month.

Mr. Bainbridge stated that the Legal Division is waiting to present the proposed Regulation Calendar until new commissioners are appointed and regulation projects necessitated by statute are completed. Chair Silver asked the California Political Attorney's Association for their feedback on regulations.

Commissioner Baker asked whether any of the counts in the Matter regarding Evan Low for Assembly 2020 and the Foundation for California's Technology and Innovation qualify for double or triple fines. Mr. Bainbridge responded that he was unsure. Commissioner Baker asked what the next step was for a probable cause proceeding like this case. Ms. West responded that the Enforcement Division will write an accusation. Commissioner Baker asked what the timeframe was. Ms. West responded that she was not sure of Enforcement Division timelines.

Administration and Technology Chief Dr. Jue Wang submitted her report and stated that the SEI unit responded to more than nine thousand emails received through the Form 700 inbox.

They appreciate patience and want to reassure that emails will be responded to as soon as possible, particularly in regard to AB 1170.

Chair Silver asked for updates on the Commission budget. Dr. Wang started that the Governor released a balanced budget but decisions regarding reductions to FPPC staff have been deferred until the Spring session. She emphasized spending with caution until the Spring. Chair Silver clarified that FPPC funding and positions are not being lost now, but they could be eliminated in the future. Dr. Wang added that the Department of Finance has proposed eliminating 6,500 positions across State government but has not released which positions those are. Commissioner Wilson asked how many positions at the FPPC could potentially be eliminated. Dr. Wang responded that 10 positions are being considered for elimination, but the FPPC has asked for exclusion from reductions.

Ms. West introduced Communications Director Shery Yang.

Chair Silver introduced new FPPC staff and thanked Commissioner Wood for her service on the Commission.

Commissioners Wilson and Baker also congratulated Commissioner Wood and thanked her for her service.

## **12. Commissioner Comments and Proposed Future Agenda Items.**

Chair Silver asked to add an agenda item to consider extending the Form 700 filing deadlines for wildfire victims. Mr. Bainbridge responded that the issue would need to appear for adoption on the March meeting agenda to affect the April 1 filing deadline.

Chair Silver asked if it could be added for prenotice in February and considered by the Law and Policy Committee. Mr. Bainbridge responded that prenotice is not required and recommended that the Legal Division submit a draft to the California Office of

Administrative Law for notice and give the Commission the option to discuss the issue in February before adoption in March.

Commissioner Baker asked if there was a way to resolve potential issues with the Form 700 for leaving office filers who have earlier deadlines. Mr. Bainbridge answered that leaving office deadlines are set by statute and the Commission does not have power to change them. Commissioner Wood asked that filers who have issues to reach out to the Commission to provide feedback.

**MOTION:** To adjourn the meeting. Moved by Chair Silver, seconded by Commissioner Wood. The motion passed 4-0.

The meeting adjourned at 2:02 p.m.

Respectfully Submitted,  
Eva Hartman  
Executive Fellow  
Approved February 3, 2025

Adam E. Silver, Chair  
Fair Political Practices Commission