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3 **FAIR POLITICAL PRACTICES COMMISSION**
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6
7 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

8
9 STATE OF CALIFORNIA

10 In the Matter of

11
12 JEFFREY WILLIAMS

13 Respondent.

) FPPC No. 22/007

)
) DEFAULT DECISION AND
) ORDER

) (Government Code Sections 11506
) and 11520)
)

14
15
16 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
17 submits this Default Decision and Order for consideration by the Fair Political Practices Commission at
18 its next regularly scheduled meeting.

19 Pursuant to the California Administrative Procedure Act,¹ Jeffrey Williams (“Williams”) has been
20 served with all of the documents necessary to conduct an administrative hearing regarding the above-
21 captioned matter, including the following:

- 22 1. An Order Finding Probable Cause;
23 2. An Accusation;
24 3. A Notice of Defense (Two Copies per Respondent);
25 4. A Statement to Respondent; and
26 5. Copies of Sections 11506, 11507.5, 11507.6 and 11507.7 of the Government Code.
27

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

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

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

13
14 Dated: _____

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

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17
18 **ORDER**

19 The Commission issues this Default Decision and Order and imposes a total administrative
20 penalty of \$22,500 upon Jeffrey Williams, payable to the "General Fund of the State of California."

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

23
24 Dated: _____

Adam E. Silver, Chair
Fair Political Practices Commission

EXHIBIT 1

INTRODUCTION

Respondent Jeffrey Williams (“Williams”) was appointed as a governing board member for the Weed Rec and Parks District (“Rec and Parks”) on May 11, 2020 for a four-year term. Williams is still serving in the position.

The Political Reform Act (“the Act”) requires designated officials to disclose their reportable economic interests on a Statement of Economic Interests (“SEI”) at various times pursuant to their agency’s Conflict of Interest Code.

As a governing board member for Rec and Parks, Williams failed to file an Assuming Office SEI and four Annual SEIs.

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.¹ Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure Act (the “APA”).² 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.³

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.⁴

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.⁵ Moreover, when a respondent fails to file a Notice of Defense, the Commission may take action

¹ Section 83116.

² The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

³ Section 11503.

⁴ Section 11506, subd. (a)(1)–(6).

⁵ Section 11506, subd. (c).

based on the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to the respondent.⁶

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.⁷

A finding of probable cause may not be made by the Commission unless the person alleged to have violated the Act is 1) notified of the violation by service of process or registered mail with return receipt requested; 2) provided with a summary of the evidence; and 3) informed of his or her right to be present in person and represented by counsel at any proceeding of the Commission held for the purpose of considering whether probable cause exists for believing the person violated the Act.⁸ 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.⁹

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.¹⁰

Documents supporting the procedural history are included in the attached Certification of Records ("Certification") filed herewith at Exhibit 1, A-1 through A-12 and A-15 through A-16, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against Williams in this matter by serving them with a Report in Support of a Finding of Probable Cause (the "First Report") (Certification, Exhibit A-1) by certified mail.¹¹ Williams was served with the First Report on March 14, 2024. (Certification, Exhibit A-2.) The administrative action commenced on March 14, 2024, and the five-year statute of limitations was effectively tolled on this date.

The Enforcement Division served Williams with a Second Report in Support of a Finding of Probable Cause (the "Second Report") by certified mail.¹² (Certification, Exhibit A-3.)

⁶ Section 11520, subd. (a).

⁷ Section 91000.5, subd. (a).

⁸ Section 83115.5.

⁹ Section 83115.5.

¹⁰ Section 91000.5.

¹¹ Section 83115.5.

¹² The First PC Report served on Williams was for four violations (Counts 1-4). The Second PC Report contained a fifth violation that was referred to the Enforcement Division after the First Report was served (Count 5).

Williams was served with the Second Report on August 6, 2024.¹³ (Certification, Exhibit A-4.) The administrative action commenced on August 6, 2024, and the five-year statute of limitations was effectively tolled on this date for the violation contained in the Second Report.

As required by Section 83115.5, both packets served on Williams contained a cover letter and a memorandum describing probable cause proceedings, advising that Williams had 21 days in which to request a probable cause conference and/or to file a written response to both the First Report and Second Report. Williams did not request a probable cause conference or submit a written response to either Report.

B. Ex Parte Request for a Finding of Probable Cause

Because Williams failed to request a probable cause conference or submit a written response to the First 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 April 11, 2024 (Certification, Exhibit A-5.)

On April 15, 2024, the Hearing Officer, John Feser, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Williams for Counts one through four. (Certification, Exhibit A-6.)

As Williams failed to request a probable cause conference or submit a written response to the Second Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Second Finding of Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on September 9, 2024 (Certification, Exhibit A-7.)

On September 10, 2024, the Hearing Officer, John Feser, issued a Second Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Williams for Count five. (Certification, Exhibit A-8.)

C. The Issuance and Service of the Accusation

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

Section 11503 states:

A hearing to determine whether a right, authority, license, or privilege should be revoked, suspended, limited, or conditioned shall be initiated by filing an

¹³ The Second PC Report was returned to the Enforcement Division by the post office on August 6, 2024, in accordance with Section 83115.5.

¹⁴ Regulation 18361.4, subd. (g).

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

On May 10, 2024, the Commission's Chief of Enforcement, James Lindsay, issued an Accusation against Williams. (Certification, Exhibit A-9.) In accordance with Section 11505, the Accusation and accompanying information, consisting of a Statement to Respondent, two copies of a Notice of Defense Form for each respondent, copies of Government Code Sections 11506, 11507.5, 11507.6, and 11507.7, were served upon Williams on June 11, 2024.¹⁸

Along with the Accusation, the Enforcement Division served Williams 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-10.) Williams did not file a Notice of Defense within the statutory time period, which ended on June 26, 2024.

¹⁵ Section 11505, subd. (a).

¹⁶ Section 11505, subd. (b).

¹⁷ Section 11505, subd. (c).

¹⁸ The initial Accusation served upon Williams was for Counts 1-4.

On October 7, 2024, the Commission’s Chief of Enforcement, James Lindsay, issued a First Amended Accusation against Williams.¹⁹ (Certification, Exhibit A-11.) In accordance with Section 11505, the First Amended 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 Williams on October 13, 2024.

Along with the First Amended Accusation, the Enforcement Division served Williams 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-12.) Williams did not file a Notice of Defense within the statutory time period, which ended on October 28, 2024.

As a result, on December 24 2024, the Enforcement Division sent a letter to Williams advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for January. (Certification, Exhibit A-15.)

On January 30, 2025, the Enforcement Division sent another letter to Williams advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for February. (Certification, Exhibit A-16.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred between 2020 and 2024. For this reason, all legal references and discussions of law pertain to the Act’s provisions as they existed at that time.

An express purpose of the Act is to promote transparency by ensuring that assets and income of public officials which may be materially affected by their official actions be disclosed so that conflicts of interests may be avoided.²⁰ Another purpose is to provide adequate enforcement mechanisms so that the Act will be “vigorously enforced.”²¹

The Act requires every state and local agency to develop a Conflict of Interest Code.²² These codes must designate those officials who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that official and require those designated officials to disclose all reportable interests on SEIs.²³ The

¹⁹ The First Amended Accusation included added count 5 for a violation that was referred to the Enforcement Division after the initial Accusation was served.

²⁰ Section 81002, subd. (c).

²¹ Section 81002, subd. (f).

²² Section 87300.

²³ Section 87302, subd. (a).

requirements of an agency's Conflict of Interest Code have the force of law, and any violations of those requirements is deemed a violation of the Act.²⁴

Regulation 18730 outlines the timing for disclosing the designated employees' economic interests as follows: all persons assuming designated positions shall file statements within 30 days after assuming the designated positions and all designated employees shall annually file statements no later than April 1.²⁵ Any person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per violation.²⁶

Weed Rec and Parks District Conflict of Interest Code approved by Siskiyou County Board of Supervisors designated Weed Rec and Parks District governing board members as a position requiring full disclosure. Therefore, this position requires completion of all schedules, disclosing all investments, business positions, interests in real property, and sources of income.²⁷ Siskiyou County incorporated by reference Regulation 18730 into its Conflict of Interest Code.

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-13 through A-14 and incorporated herein by reference.

Williams was appointed as a governing board member for Rec and Parks on May 11, 2020, for a four-year term. Williams is currently serving in the position. (Certification, Exhibit A-13.) Williams was required to file an Assuming Office SEI timely within 30 days of assuming office by the June 22, 2020 deadline.

Williams was required to timely file a 2020 Annual SEI by the April 1, 2021 deadline. The Filing Officer made multiple attempts to notify Williams of their duty to file an Assuming Office and 2020 Annual SEI. On January 25, 2021; February 9, 2021; March 4, 2021; March 27, 2021; April 9, 2021; and May 12, 2021, the Filing Officer notified Williams by US mail and email of the obligation to file. Williams did not respond to the requests or file the outstanding SEIs. (Certification, Exhibit A-14.)

On June 7, 2021, the Filing Officer declared Williams as a non-filer and referred Williams to the Enforcement Division.

Williams was required to timely file a 2021 Annual SEI by the April 1, 2022 deadline.

Williams was required to timely file a 2022 Annual SEI by the April 3, 2023 deadline.

²⁴ Section 87300.

²⁵ Regulation 18730, subd. (b)(5)(B)-(C).

²⁶ Sections 83116 and 83116.5.

²⁷ Conflict of Interest Code for the Weed Rec and Parks District approved by Siskiyou County Board of Supervisors.

Williams was required to timely file a 2023 Annual SEI by the April 2, 2024 deadline.

To date, Williams has not filed any outstanding SEIs or responded to any requests to file.

Williams failed to timely file the following SEIs.

Type of Statement	Date Due	Date Filed
Assuming Office	6/22/2020	Not filed
2020 Annual	4/1/2021	Not filed
2021 Annual	4/1/2022	Not filed
2022 Annual	4/3/2023	Not filed
2023 Annual	4/2/2024	Not filed

Summary of Contact

The Enforcement Division contacted Williams multiple times regarding the investigation. At no point did Williams respond to Enforcement's attempts at contact.

Overall, the Enforcement Division contacted Williams approximately eighteen times throughout this case, as follows:

- January 6, 2022: email from Enforcement Division regarding this case
- January 27, 2022: email from Enforcement Division regarding this case
- February 11, 2022: email from Enforcement Division regarding this case
- April 25, 2022: email from Enforcement Division regarding this case
- October 31, 2023: email from Enforcement Division regarding this case
- November 7, 2023: email from Enforcement Division regarding this case
- November 15, 2023: email from Enforcement Division regarding this case
- November 29, 2023: voice mail left from Enforcement Division
- December 8, 2023: email from Enforcement Division regarding this case
- January 2, 2024: voice mail left from Enforcement Division
- January 3, 2024: email from Enforcement Division regarding this case
- January 17, 2024: email from Enforcement Division regarding this case
- January 23, 2024: voice mail left and email from Enforcement Division regarding this case
- June 11, 2024: accusation personally served from Enforcement Division
- September 18, 2024: email from Enforcement Division regarding this case
- December 24, 2024: letter to Williams informing them that a Default Decision and Order would appear on the agenda for the January 16, 2025 Commission Meeting as a notice item

- January 30, 2025: Notice of Intent to Enter Default Decision and Order to Williams informing them that the Default Decision and Order would be presented at the February 13, 2025 meeting for Commission action

VIOLATIONS

Williams committed five violations of the Act as follows:

COUNT 1

Failure to Timely File an Assuming Office SEI

Williams had a duty to timely file their Assuming Office SEI, due on June 22, 2020. By failing to timely file their Assuming Office SEI, due on June 22, 2020, Williams violated Government Code Sections 87300.

COUNT 2

Failure to Timely File a 2020 Annual SEI

Williams had a duty to timely file their 2020 Annual SEI, due on April 1, 2021. By failing to timely file their 2020 Annual SEI, due on April 1, 2021, Williams violated Government Code Sections 87300.

COUNT 3

Failure to Timely File a 2021 Annual SEI

Williams had a duty to timely file their 2021 Annual SEI, due on April 1, 2022. By failing to timely file their 2021 Annual SEI, due on April 1, 2022, Williams violated Government Code Section 87300.

COUNT 4

Failure to Timely File a 2022 Annual SEI

Williams had a duty to timely file their 2022 Annual SEI, due on April 3, 2023. By failing to timely file their 2022 Annual SEI, due on April 3, 2023, Williams violated Government Code Section 87300.

COUNT 5

Failure to Timely File a 2023 Annual SEI

Williams had a duty to timely file their 2023 Annual SEI, due on April 2, 2024. By failing

to timely file their 2022 Annual SEI, due on April 2, 2024, Williams violated Government Code Section 87300.

CONCLUSION

This matter consists of 5 counts of violating the Act, which carry a maximum total administrative penalty of \$25,000.²⁸

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.²⁹

In this matter, Williams failed to timely file one Assuming Office SEI and four Annual SEIs for their position as a governing board member for Rec and Parks.

Here, failure to file annual SEIs deprives the public of important information about a public official's economic interests which could lead to potential conflicts of interests regarding decisions they make in their official capacity. Williams has failed to file the missing SEIs, despite repeated outreach attempts. Williams's violations deprived the public of important and timely information regarding their economic interests, and they have not filed these SEIs to date.

Williams has been a board member since 2020 and is currently in office. As such, Williams should be aware that the Act required filing of SEIs.

Williams has no prior record of violations of the Act for statements of economic interests violations.

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

²⁸ Section 83116, subd. (c).

²⁹ Regulation 18361.5, subd. (e).

Count 1-3

- *In the Matter of Jennifer Allsup*, FPPC No. 16/20047. (The Commission approved a default decision on October 15, 2020.) The respondent failed to timely file two Annual SEIs and a Leaving Office SEI despite being contacted several times regarding this matter. Allsup was no longer in office at the time of the default but did previously file SEIs timely. Allsup did not have a prior enforcement history. The Commission imposed a penalty of \$4,000 per count, \$12,000 in total for this violation.

This case is similar to the present matter as Williams is well aware of their obligation to file SEIs, they are still in office, and they have failed to file despite multiple requests for compliance from the Filing Officer and the Enforcement Division. Additionally, Williams does not have prior enforcement history. This case is distinguishable because Williams was in office at the time of the default. Therefore, a higher default penalty amount is recommended.

PROPOSED PENALTY

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

Counts	Violations: Williams	Proposed Penalty per Count
1	Failure to Timely File an Assuming Office Statement of Economic Interest	\$4,500
2-5	Failure to Timely File an Annual Statement of Economic Interest	\$4,500
	Total:	\$22,500



**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. 22/007; Jeffrey Williams* 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 March 11, 2024

EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated March 12, 2024, and accompanying certified mail receipts

EXHIBIT A-3: Second Report in Support of a Finding of Probable Cause, dated July 15, 2024

EXHIBIT A-4: Proof of Service for the Second Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated July 16, 2024 and accompanying certified mail receipts

EXHIBIT A-5: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated April 11, 2024

- EXHIBIT A-6: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated April 15, 2024
- EXHIBIT A-7: Ex Parte Request for a Second Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated September 9, 2024
- EXHIBIT A-8: Second Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated September 10, 2024
- EXHIBIT A-9: Accusation, dated May 10, 2024
- EXHIBIT A-10: Proof of Service for Accusation and accompanying documents from process server, dated June 24, 2024
- EXHIBIT A-11: First Amended Accusation, dated October 7, 2024
- EXHIBIT A-12: Proof of Service for First Amended Accusation and accompanying documents from process server, dated October 14, 2024.
- EXHIBIT A-13: County of Siskiyou Clerk's Office Notifications for outstanding Assuming Office SEI and 2021 Annual SEI
- EXHIBIT A-14: Weed Recreation and Parks District Agenda, October 17, 2024
- EXHIBIT A-15: Notice of Default Decision and Order, dated December 24, 2024
- EXHIBIT A-16: Notice of Intent to Enter Default Decision and Order, dated January 30, 2025

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 29, 2025, at Sacramento, California.



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

Exhibit A-1

1 JAMES M. LINDSAY
Chief of Enforcement
2 LAURA COLUMBEL
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
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5 Email: lcolumbel@fppc.ca.gov

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

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

11 In the Matter of) FPPC No. 2022-00007
12)
13) **REPORT IN SUPPORT OF A FINDING OF**
JEFFREY WILLIAMS,) **PROBABLE CAUSE**
14)
15) Conference Date: TBA
Respondent.) Conference Time: TBA
16) Conference Location: Commission Offices
17) 1102 Q Street, Suite 3050
18) Sacramento, CA 95811
19)
20)
21)
22)
23)
24)
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26)
27)
28)

INTRODUCTION

Respondent, Jeffrey Williams (“Williams”), was appointed as a Governing Board Member for the Weed Rec and Parks District (“Rec and Parks”) for a four-year term on May 11, 2020.

The Political Reform Act (the “Act”)¹ requires designated officials to disclose their reportable economic interests on a Statement of Economic Interests (“SEI”) at various times pursuant to their agency’s Conflict of Interest Code. Williams violated the Act by failing to timely file an Assuming

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.

1 Office SEI by the June 22, 2020 due date, a 2020 Annual SEI by the April 1, 2021 due date, a 2021
2 Annual SEI by the April 1, 2022 due date, and a 2022 Annual SEI by the April 3, 2023 due date for his
3 position as Governing Board Member for the Weed Rec and Parks District.

4 **SUMMARY OF THE LAW**

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

9 **Jurisdiction and Probable Cause Proceedings**

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

20 **Standard for Finding Probable Cause**

21 For the hearing officer to make a finding of probable cause, it is only necessary that he or she be
22 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act
23

24 ² Section 83111.

25 ³ Section 83116.

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

27 ⁵ Regulation 18361.4, subd. (g).

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

1 has been violated.⁷ Probable cause may only be found if the Respondents were notified of the violations
2 at least 21 days prior to the hearing officer’s consideration of the alleged violations.⁸

3 **Contents of the Probable Cause Report**

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

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

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

12 One purpose of the Act is to promote transparency by ensuring that assets and income of public
13 officials which may be materially affected by their official actions be disclosed so that conflicts of
14 interests may be avoided.¹² Another purpose of the Act is to provide adequate enforcement mechanisms
15 so that the Act will be “vigorously enforced.”¹³

16 **Conflict of Interest Codes**

17 The Act requires every state and local agency to develop a Conflict of Interest Code.¹⁴ These
18 codes must designate those officials who participate in making decisions which may foreseeably have a
19 material financial effect on any financial interest belonging to that official and require those designated
20 officials to disclose all reportable interests on SEIs.¹⁵ The requirements of an agency’s Conflict of
21

22 ⁷ Regulation 18361.4, subd. (a).

23 ⁸ Section 83115.5.

24 ⁹ Regulation 18361.4, subd. (b).

25 ¹⁰ Section 81001, subd. (h).

26 ¹¹ Section 81003.

27 ¹² Section 81002, subd. (c).

28 ¹³ Section 81002, subd. (f).

¹⁴ Section 87300.

¹⁵ Section 87302, subd. (a).

1 Interest Code have the force of law, and any violations of those requirements is deemed a violation of
2 the Act.¹⁶

3 **Regulation 18730 and Liability for Violation**

4 Regulation 18730 outlines the timing for disclosing the designated employees' economic
5 interests as follows: all designated employees shall annually file statements no later than April 1.¹⁷ Any
6 person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per
7 violation.¹⁸

8 **Conflict of Interest Codes for Weed Rec and Parks District**

9 Weed Rec and Parks District Conflict of Interest Code approved by Siskiyou County Board of
10 Supervisors designated Weed Rec and Parks District Governing Board Members as a position requiring
11 full disclosure. Therefore, this position requires completion of all schedules, disclosing all investments,
12 business positions, interests in real property, and sources of income.¹⁹ Siskiyou County incorporated by
13 reference Regulation 18730 into its Conflict of Interest Code.²⁰

14 **SUMMARY OF THE EVIDENCE**

15 Williams was appointed as a Governing Board Member for Weed Rec and Parks District for a
16 four-year term on May 11, 2020. To date, Williams continues to hold his position with Rec and Parks
17 according to records maintained by Siskiyou County's filing officer. Williams failed to timely file his
18 Assuming Office SEI by the June 22, 2020 due date, 2020 Annual SEI by the April 1, 2021 due date,
19 2021 Annual SEI by the April 1, 2022 due date, and 2022 Annual SEI by the April 3, 2023 due date.

20 The Siskiyou County Clerk contacted Williams sixteen times by email and eight times via mail
21 from May 12, 2020 to May 15, 2023 to remind Williams of his filing obligations. After not receiving
22 compliance from Williams regarding his outstanding SEIs, the filing officer referred the matter to the
23 Enforcement Division.

24 ¹⁶ Section 87300.

25 ¹⁷ Regulation 18730, subd. (b)(5)(C).

26 ¹⁸ Sections 83116 and 83116.5.

27 ¹⁹ Conflict of Interest Code for the Weed Rec and Parks District approved by Siskiyou County Board of Supervisors.

28 ²⁰ Conflict of Interest Code for the Weed Rec and Parks District approved by Siskiyou County Board of Supervisors.

1 The Commission's Enforcement Division contacted Williams seven times in writing and left
2 three voice messages between November 8, 2023 and January 23, 2024 to remind Williams of his
3 outstanding Annual SEI and Assuming Office SEI filing obligations. To date, Williams has not
4 contacted the Enforcement Division and has failed to file the outstanding SEIs.

5 **VIOLATIONS**

6 Count 1: Failure to Timely File Assuming Office Statement of Economic Interest

7 Williams failed to timely file his Assuming Office SEI by the June 22, 2020 due date, in
8 violation of Government Code Section 87300.

9 Count 2: Failure to Timely File 2020 Annual Statement of Economic Interest

10 Williams failed to timely file his 2020 Annual SEI by the April 1, 2021 due date, in violation of
11 Government Code Section 87300.

12 Count 3: Failure to Timely File 2021 Annual Statement of Economic Interest

13 Williams failed to timely file his 2021 Annual SEI by the April 1, 2022 due date, in violation of
14 Government Code Section 87300.

15 Count 4: Failure to Timely File 2022 Annual Statement of Economic Interest

16 Williams failed to timely file his 2022 Annual SEI by the April 3, 2023 due date, in violation of
17 Government Code Section 87300.

18 **EXCULPATORY INFORMATION**

19 The Enforcement Division is not aware of any exculpatory evidence at the present time.

20 **OTHER RELEVANT EVIDENCE**

21 Williams was notified of his outstanding filing obligations by the filing officer and by the
22 Enforcement Division staff at least 34 different times via communications by mail, email, and
23 telephone. To date, Williams has not filed his 2020, 2021, or 2022 Annual SEIs and Assuming Office
24 SEI.

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CONCLUSION

Probable cause exists to believe that Williams 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.

Dated: 03/11/2024

Respectfully Submitted,
FAIR POLITICAL PRACTICES COMMISSION
James M. Lindsay
Chief of Enforcement

Laura Columbel

By: Laura Columbel
Commission Counsel
Enforcement Division

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, 428 J Street, Suite 620, Sacramento, California 95814. On March 12, 2024, I served the following document(s):

1. Letter dated March 11, 2024, from Laura Columbel;
2. FPPC No. 22/00007 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 United States Postal Service. I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the addresses listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

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

SERVICE LIST

Jeffrey Williams


I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on March 12, 2024.



Stacey Anderson-Wise

2022-00007

7020 0640 0002 2861 6255

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<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____

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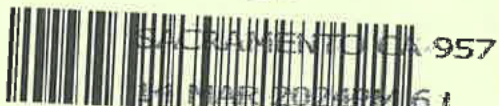
Postage

Jeffrey Williams



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>Jeffrey Williams</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>																
<p>1. Article Addressed to:</p> <p>Jeffrey Williams</p> <div style="background-color: black; width: 100px; height: 30px; margin-top: 10px;"></div>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
 9590 9402 6385 0303 6973 63	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
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<p>2. Article Number (Transfer from service label)</p> <p>7020 0640 0002 2861 6255</p>	<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p>																

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24 MAR 2020 11 16 L

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First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

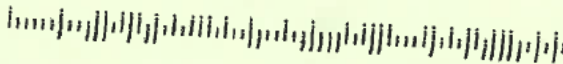
United States Postal Service

RECEIVED
FAIR POLITICAL PRACTICES COMMISSION
24 MAR 18 PM 3:23

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Fair Political Practices Commission
1102 Q Street, Suite 3050
Sacramento, California 95811

V.C. 2022-00007



Tracking Number:

70200640000228616255

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Latest Update

Your item was delivered to an individual at the address at 11:44 am on March 14, 2024 in WEED, CA 96094.

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USPS Tracking Plus®

Delivered

Delivered, Left with Individual

WEED, CA 96094

March 14, 2024, 11:44 am

Return to Sender

WEED, CA 96094

March 14, 2024, 11:44 am

Arrived at USPS Regional Facility

REDDING CA DISTRIBUTION CENTER

March 13, 2024, 9:07 pm

In Transit to Next Facility

March 13, 2024

Arrived at USPS Regional Facility

SACRAMENTO CA DISTRIBUTION CENTER

March 12, 2024, 10:26 pm

Hide Tracking History

[What Do USPS Tracking Statuses Mean?](#)

Exhibit A-3

1 JAMES M. LINDSAY
Chief of Enforcement
2 LAURA COLUMBEL
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
4 Sacramento, CA 95811
Telephone: 279-237-5974
5 Email: LCoumbel@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. 2022-00007
12)
13 JEFFREY WILLIAMS) **SECOND REPORT IN SUPPORT OF A**
14) **FINDING OF PROBABLE CAUSE**
15 Respondent.) Conference Date: TBA
16) Conference Time: TBA
17) Conference Location: Commission Offices
18) 1102 Q Street, Suite 3050
19) Sacramento, CA 95811
20)
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23)
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19 **INTRODUCTION**

20 Respondent, Jeffrey Williams (“Williams”), was appointed as a Governing Board Member for
21 the Weed Rec and Parks District (“Rec and Parks”) for a four-year term on May 11, 2020.

22 The Political Reform Act (the “Act”)¹ requires designated officials to disclose their reportable
23 economic interests on a Statement of Economic Interests (“SEI”) at various times pursuant to their
24 agency’s Conflict of Interest Code. Williams violated the Act by failing to timely file a 2023 Annual

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

1 SEI by the April 2, 2024 due date for his position as Governing Board Member for the Weed Rec and
2 Parks District.

3 **SUMMARY OF THE LAW**

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

8 **Jurisdiction and Probable Cause Proceedings**

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

19 **Standard for Finding Probable Cause**

20 For the hearing officer to make a finding of probable cause, it is only necessary that he or she be
21 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act
22
23

24 ² Section 83111.

25 ³ Section 83116.

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

27 ⁵ Regulation 18361.4, subd. (g).

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

1 has been violated.⁷ Probable cause may only be found if the Respondents were notified of the violations
2 at least 21 days prior to the hearing officer’s consideration of the alleged violations.⁸

3 **Contents of the Probable Cause Report**

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

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

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

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

17 **Conflict of Interest Codes**

18 The Act requires every state and local agency to develop a Conflict of Interest Code.¹⁵ These
19 codes must designate those officials who participate in making decisions which may foreseeably have a
20 material financial effect on any financial interest belonging to that official and require those designated
21

22 ⁷ Regulation 18361.4, subd. (a).

23 ⁸ Section 83115.5.

24 ⁹ Regulation 18361.4, subd. (b).

25 ¹⁰ Section 81001, subd. (h).

26 ¹¹ Section 81003.

27 ¹² Section 81002, subd. (a).

28 ¹³ Sections 84200, *et seq.*

¹⁴ Section 81002, subd. (f).

¹⁵ Section 87300.

1 officials to disclose all reportable interests on SEIs.¹⁶ The requirements of an agency’s Conflict of
2 Interest Code have the force of law, and any violations of those requirements is deemed a violation of
3 the Act.¹⁷

4 **Regulation 18730 and Liability for Violation**

5 Regulation 18730 outlines the timing for disclosing the designated employees’ economic
6 interests as follows: all designated employees shall annually file statements no later than April 1.¹⁸ Any
7 person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per
8 violation.¹⁹

9 **Conflict of Interest Codes for Weed Rec and Parks District**

10 Weed Rec and Parks District Conflict of Interest Code approved by Siskiyou County Board of
11 Supervisors designated Weed Rec and Parks District Governing Board Members as a position requiring
12 full disclosure. Therefore, this position requires completion of all schedules, disclosing all investments,
13 business positions, interests in real property, and sources of income.²⁰ Siskiyou County incorporated by
14 reference Regulation 18730 into its Conflict of Interest Code.²¹

15 **SUMMARY OF THE EVIDENCE**

16 Williams was appointed as a Governing Board Member for Weed Rec and Parks District for a
17 four-year term on May 11, 2020. This case was initially opened in response to a referral from Siskiyou
18 County regarding failure to file an Assuming Office SEI and three Annual SEIs.

19 A Probable Cause Report (“PC report”) was previously served in this matter on March 18, 2024,
20 for violations of the Act against Williams for failing to timely file an Assuming Office SEI and Annual
21 2020, 2021, and 2022 SEIs. By means of an Ex Parte Request for a Finding of Probable Cause and an
22

23
24 ¹⁶ Section 87302, subd. (a).

25 ¹⁷ Section 87300.

26 ¹⁸ Regulation 18730, subd. (b)(5)(C).

27 ¹⁹ Sections 83116 and 83116.5.

28 ²⁰ Conflict of Interest Code for the Weed Rec and Parks District approved by Siskiyou County Board of Supervisors.

²¹ *Ibid.*

1 Order that an Accusation Be Prepared and Served (“Ex Parte Request”), dated April 11, 2024, the
2 Enforcement Division submitted the matter to the Hearing Officer for a determination of probable cause.
3 On April 18, 2024, the Hearing Officer issued an order finding that there was probable cause to believe
4 Williams violated the Act by failing to file his Assuming Office SEI and 2020, 2021, and 2022 Annual
5 SEIs. The Hearing Officer directed the Enforcement Division to issue an Accusation against Williams in
6 accordance with the finding.

7 To date, Williams continues to hold his position with Rec and Parks according to records
8 maintained by Siskiyou County’s filing officer. Williams is obligated under the Act to continue to file
9 Annual SEIs as an appointed Governing Board Member for Weed Rec and Parks District.²² Williams
10 has not filed any SEIs since assuming office.

11 The Siskiyou County Clerk contacted Williams five times by email and two times via mail from
12 January 31, 2024 to May 15, 2024 to remind Williams of his 2023 Annual SEI filing obligation. After
13 not receiving compliance from Williams regarding his outstanding SEI, the filing officer referred the
14 matter to the Enforcement Division on June 21, 2024.

15
16 **VIOLATIONS**

17 Count 5: Failure to Timely File 2023 Annual Statement of Economic Interest

18 Williams failed to timely file his 2023 Annual SEI by the April 2, 2024 due date, in violation of
19 Government Code Section 87300.

20 **EXCULPATORY INFORMATION**

21 The Enforcement Division is not aware of any exculpatory evidence.

22 **OTHER RELEVANT EVIDENCE**

23 Williams was notified by the filing officer and by the Enforcement Division of his outstanding
24 filing obligations at least 42 different times via communications by mail, email, and telephone. To date,
25 Williams has not filed his 2020, 2021, 2022, and 2023 Annual SEIs and Assuming Office SEI.

26

²² Section 87302.

1 **CONCLUSION**

2 Probable cause exists to believe that Williams violated the Act as detailed above. The
3 Enforcement Division respectfully requests an order finding probable cause pursuant to Section
4 83115.5 and Regulation 18361.4.

5
6 Dated: July 15, 2024

7 Respectfully Submitted,

8 **FAIR POLITICAL PRACTICES COMMISSION**
9 James M. Lindsay
10 Enforcement Chief

11 *Laura Columbel*

12
13

By: Laura Columbel
14 Commission Counsel
15 Enforcement Division
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27

Exhibit A-4

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 16, 2024, I served the following document(s):

1. Letter dated July 15, 2024, from Laura Columbel;
2. FPPC No. 22/007 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. Probable Cause Report Checklist


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

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

SERVICE LIST

Jeffrey Williams


I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 16, 2024.



Stacey Anderson-Wise

Vaura Columbel
2022-00007

9589 0710 5270 0589 2285 88

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Certified Mail Fee \$ _____	Postmark Here
Extra Services & Fees <i>(check box, add fee as appropriate)</i>	
<input type="checkbox"/> Return Receipt (hardcopy) \$ _____	
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PS Form 3800, January 2023 PSN 7530-02-000-3047 See Reverse for Instructions	

Tracking Number:

9589071052700589228588

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Latest Update

Your item has been delivered to the original sender at 2:59 pm on August 6, 2024 in ZIP Code 95800.

Get More Out of USPS Tracking:

 USPS Tracking Plus®

- Delivered**
 Delivered, To Original Sender
 95800
 August 6, 2024, 2:59 pm
- In Transit to Next Facility**
 August 5, 2024
- Arrived at USPS Facility**
 SACRAMENTO, CA 95813
 August 3, 2024, 7:23 am
- Unclaimed/Being Returned to Sender**
 WEED, CA 96094
 August 2, 2024, 8:03 am
- Reminder to Schedule Redelivery of your item**
 July 23, 2024
- Notice Left (No Authorized Recipient Available)**
 WEED, CA 96094
 July 18, 2024, 9:47 am
- Arrived at USPS Regional Facility**
 REDDING CA DISTRIBUTION CENTER
 July 17, 2024, 8:49 pm
- [Hide Tracking History](#)

Exhibit A-5

1 JAMES M. LINDSAY
Chief of Enforcement
2 LAURA COLUMBEL
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
Sacramento, CA 95811
4 Telephone: (279) 237-5974
5 Email: lcolumbel@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 In the Matter of) FPPC No. 2022-00007
11)
12 JEFFREY WILLIAMS,) EX PARTE REQUEST FOR A FINDING OF
13) PROBABLE CAUSE AND AN ORDER THAT
Respondent.) AN ACCUSATION BE PREPARED AND
14) SERVED
15) Gov. Code § 83115.5
16)

17 **TO THE HEARING OFFICER OF THE FAIR POLITICAL PRACTICES COMMISSION:**

18 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)¹ and Regulation 18361.4,
19 Respondent Jeffrey Williams (“Williams”) was served with a copy of a report in support of a finding of
20 probable cause (“PC Report”) in the above-entitled matter.² The PC Report, attached as “Exhibit A,” was
21 part of a packet of materials, including a cover letter, a memorandum describing probable cause
22 proceedings, and a probable cause checklist form, which was sent to Williams on March 12, 2024 by
23 certified mail, with return receipt requested, and was delivered on March 18, 2024. A copy of the proof of
24 service and return receipt is attached as “Exhibit B.”

25 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.

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

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

11 WHEREFORE, based on the attached PC Report, the Enforcement Division requests a finding by
12 the Hearing Officer that probable cause exists to believe that the Respondent committed four violations
13 of the Act, stated as follows:

14 Count 1: Williams failed to timely file his Assuming Office SEI by the June 22, 2020 due date, in
violation of Government Code Section 87300.

15 Count 2: Williams failed to timely file his 2020 Annual SEI by the April 1, 2021 due date, in violation
16 of Government Code Section 87300.

17 Count 3: Williams failed to timely file his 2021 Annual SEI by the April 1, 2022 due date, in violation
of Government Code Section 87300.

18 Count 4: Williams failed to timely file his 2022 Annual SEI by the April 3, 2023 due date, in violation
19 of Government Code Section 87300.

20 Additionally, after finding probable cause exists, the Enforcement Division requests an order by
the Hearing Officer that an accusation be prepared against Williams and served upon him.³

21 ///

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24 _____
25
26 ³ Gov. Code § 11503.

1 A copy of this Request was mailed via U.S. Mail to Williams on April 11, 2024 at the last known
2 address, as follows:

3 Jeffrey Williams
4 [REDACTED]
5 [REDACTED]

6
7 Dated: 4/11/2024

Respectfully Submitted,

8
9 **FAIR POLITICAL PRACTICES COMMISSION**
10 James M. Lindsay
11 Chief of Enforcement

12 *Laura Columbel*

13 By: Laura Columbel
14 Commission Counsel
15 Enforcement Division
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Exhibit A-6

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p>	<p>In the Matter of</p> <p>JEFFREY WILLIAMS,</p> <p>Respondent.</p>	<p>) FPPC No. 2022-00007</p> <p>)</p> <p>)</p> <p>) FINDING OF PROBABLE CAUSE AND</p> <p>) ORDER TO PREPARE AND SERVE AN</p> <p>) ACCUSATION</p> <p>)</p> <p>) Gov. Code § 83115.5</p> <p>)</p> <p>)</p>
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9 By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation
10 Be Prepared and Served, dated April 11, 2024, the Enforcement Division submitted the above-entitled
11 matter to the Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request
12 for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served (“Ex Parte
13 Request”), the Enforcement Division served a Report in Support of a Finding of Probable Cause (“PC
14 Report”) on Respondent Jeffrey Williams (“Williams”) on March 18, 2024 by certified mail, return receipt
15 requested. Accompanying the PC Report was a packet of materials that informed the Respondent of his
16 right to file a written response to the PC Report and to request a probable cause conference within 21 days
17 following service of the PC Report, or transmittal of any requested records by the Enforcement Division.
18 During the 21 days that followed service of the PC Report, Respondent did not file a response to the PC
19 Report, request records, or request a probable cause conference. Pursuant to California Code of
20 Regulations title 2, section 18361.4,¹ determination of probable cause may be made solely on papers
21 submitted when the respondent does not request a probable cause conference.

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

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

1 Probable cause to believe a violation has occurred can be found to exist when “the evidence
2 sufficiently supports a reasonable belief or strong suspicion that the Act has been violated. .”²

3 The PC Report served on Respondent Williams and the subsequent Ex Parte Request in this matter
4 alleges four violations of the Political Reform Act were committed, as follows:

5 Count 1: Williams failed to timely file his Assuming Office SEI by the June 22, 2020 due date, in
violation of Government Code Section 87300.

6 Count 2: Williams failed to timely file his 2020 Annual SEI by the April 1, 2021 due date, in violation
7 of Government Code Section 87300.

8 Count 3: Williams failed to timely file his 2021 Annual SEI by the April 1, 2022 due date, in violation
of Government Code Section 87300.

9 Count 4: Williams failed to timely file his 2022 Annual SEI by the April 3, 2023 due date, in violation
10 of Government Code Section 87300.

11 Based on the Ex Parte Request given to me, I find that notice has been given to Williams.³ I further
12 find, based on the PC Report and the Ex Parte Request, that there is probable cause to believe that Williams
13 violated the Political Reform Act as alleged in Counts 1-4, as identified above.

14 I therefore direct that the Enforcement Division issue an accusation against Williams in accordance
15 with this finding.

16 IT IS SO ORDERED.

17
18 Dated: April 15, 2024



19 Hearing Officer
20 Fair Political Practices Commission

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

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

FPPC No. 2022-00007, In the matter of CASERTA FOR SUPERVISOR 2018, AND DOMINIC CASERTA

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

Jeffrey Williams


(By Personal Service) On Thursday, April 18, 2024, at approximately 2:30 p.m., I personally served:

Laura Columbel, 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 April 18, 2024.



Sasha Linker

Exhibit A-7

1 JAMES M. LINDSAY
Chief of Enforcement
2 LAURA COLUMBEL
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
Sacramento, CA 95811
4 Telephone: (279) 237-5974
5 Email: lcolumbel@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 In the Matter of) FPPC No. 2022-00007
11)
12 JEFFREY WILLIAMS,) SECOND EX PARTE REQUEST FOR A
13 Respondent.) FINDING OF PROBABLE CAUSE AND AN
14) ORDER THAT AN ACCUSATION BE
15) PREPARED AND SERVED
16) Gov. Code § 83115.5
17)
18)

19 **TO THE HEARING OFFICER OF THE FAIR POLITICAL PRACTICES COMMISSION:**

20 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)¹ and Regulation 18361.4,
21 Respondent Jeffrey Williams (“Williams”) was served with a copy of a report in support of a finding of
22 probable cause (“Second PC Report”) in the above-entitled matter.² The Second PC Report, attached as
23 “Exhibit A,” was part of a packet of materials, including a cover letter, a memorandum describing probable
24 cause proceedings, and a probable cause checklist form, which was sent to Williams on July 16, 2024 by
25 certified mail, with return receipt requested, and was returned to the Enforcement Division by the post

26 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.

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

1 office on August 6, 2024, in accordance with section 83115.5. A copy of the proof of service, returned
2 mail, and USPS tracking are attached as “Exhibit B.”

3 In the cover letter dated July 15, 2024 and the attached materials, Williams was advised that he
4 could respond in writing to the Second PC Report and orally present the case to the Hearing Officer at a
5 probable cause conference to be held in Sacramento. Williams was further advised that in order to have a
6 probable cause conference he needed to make a written request for one within 21 days of the date he
7 received the Second PC Report, or the date requested records were sent by the Enforcement Division.
8 Additionally, Williams was advised that if he did not request a probable cause conference, such a
9 conference would not be held and probable cause would be determined based solely on the Second PC
10 Report and any written response that he submitted within 21 days of the date he was served with the
11 Second PC Report, or the date requested records were sent by the Enforcement Division. To date, Williams
12 has not submitted a written response or requested a probable cause conference.

13 WHEREFORE, based on the attached Second PC Report, the Enforcement Division requests a
14 finding by the Hearing Officer that probable cause exists to believe that the Respondent committed one
15 additional violation of the Act, stated as follows³:

16
17 Count 5: Williams failed to timely file his 2023 Annual SEI by the April 2, 2024 due date, in violation
of Government Code Section 87300.

18 Additionally, after finding probable cause exists, the Enforcement Division requests an order by
19 the Hearing Officer that an accusation be prepared against Williams and served upon him.⁴
20
21

22 ///

23
24 _____
25 ³ An initial PC Report for four violations was served on Williams on May 2, 2024 and a Finding of Probable Cause and Order
to Prepare and Serve an Accusation (“First Order”) for Counts 1-4 was granted on April 15, 2024. The violation in Count 5
was referred to the Enforcement Division after the First Order was granted.

26 ⁴ Gov. Code § 11503.

1 A copy of this Request was mailed via U.S. Mail to Williams on April 9, 2024 at the last known
2 address, as follows:

3 Jeffrey Williams
4 [REDACTED]
5 [REDACTED]

6
7 Dated: 9/9/2024

Respectfully Submitted,

8
9 **FAIR POLITICAL PRACTICES COMMISSION**
10 James M. Lindsay
11 Chief of Enforcement

12 *Laura Columbel*

13 By: Laura Columbel
14 Commission Counsel
15 Enforcement Division
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Exhibit A-8

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3
4 In the Matter of) FPPC No. 2022-00007
5 JEFFREY WILLIAMS,)
6 Respondent.) SECOND FINDING OF PROBABLE CAUSE
7) AND ORDER TO PREPARE AND SERVE AN
8) ACCUSATION
9) Gov. Code § 83115.5
10)

11 By means of a Second Ex Parte Request for a Finding of Probable Cause and an Order that an
12 Accusation Be Prepared and Served, dated September 9, 2024, the Enforcement Division submitted the
13 above-entitled matter to the Hearing Officer for a determination of Probable Cause. As set forth in the
14 Second Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared
15 and Served (“Second Ex Parte Request”), the Enforcement Division served a Second Report in Support
16 of a Finding of Probable Cause (“Second PC Report”) on Respondent Jeffrey Williams (“Williams”) on
17 August 6, 2024 by certified mail, return receipt requested. Accompanying the Second PC Report was a
18 packet of materials that informed the Respondent of his right to file a written response to the Second PC
19 Report and to request a probable cause conference within 21 days following service of the PC Report, or
20 transmittal of any requested records by the Enforcement Division. During the 21 days that followed service
21 of the Second PC Report, Respondent did not file a response to the Second PC Report, request records, or
22 request a probable cause conference. Pursuant to California Code of Regulations title 2, section 18361.4,
23 ¹ determination of probable cause may be made solely on papers submitted when the respondent does not
24 request a probable cause conference.

25 In making a probable cause determination, it is the duty of the Hearing Officer of the Fair Political
26 Practices Commission to determine whether probable cause exists to believe that a respondent violated

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

1 the Political Reform Act as alleged by the Enforcement Division in the Second PC Report served on the
2 respondent.

3 Probable cause to believe a violation has occurred can be found to exist when “the evidence
4 sufficiently supports a reasonable belief or strong suspicion that the Act has been violated. .”²

5 The Second PC Report served on Respondent Williams and the subsequent Second Ex Parte
6 Request in this matter alleges one additional violation³ of the Political Reform Act were committed, as
7 follows:


8
9 Count 5: Williams failed to timely file his Annual 2023 SEI by the April 2, 2024 due date, in violation
of Government Code Section 87300.

10 Based on the Second Ex Parte Request given to me, I find that notice has been given to Williams.⁴
11 I further find, based on the Second PC Report and the Second Ex Parte Request, that there is probable
12 cause to believe that Williams violated the Political Reform Act as alleged in Counts 5, as identified above.

13 I therefore direct that the Enforcement Division issue an accusation against Williams in accordance
14 with this finding.

15 IT IS SO ORDERED.

16
17
18 Dated: September 10, 2024



Hearing Officer
Fair Political Practices Commission

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

26 ³ An initial PC Report for four violations was served on Williams on May 2, 2024 and a Finding of Probable Cause and Order
27 to Prepare and Serve an Accusation (“First Order”) for Counts 1-4 was granted on April 15, 2024. The violation in Count 5
was referred to the Enforcement Division after the First Order was granted.

⁴ Government Code § 83115.5; Cal. Code Reg., tit. 2, §18361.4, subd. (c).

FPPC No. 2022-00007, In the matter of Jeffrey Williams,

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

Jeffrey Williams


(By Personal Service) On Thursday, September 19, 2024, at approximately 10:00 a.m., I personally served:

Laura Columbel, 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 September 19, 2024.



Sasha Linker

Exhibit A-9

1 JAMES M. LINDSAY
Chief of Enforcement
2 LAURA COLUMBEL
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q St, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5974
5 Email: LColumbel@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. 22/007
12)
13 JEFFREY WILLIAMS) **ACCUSATION**
14)
15 Respondents.) (Gov. Code §11503)
16)
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, specifically
25 including, but not limited to, Government Code Sections 83111, 83116, and 91000.5, which assign to the
26 Enforcement Division the duty to administer, implement, and enforce the provisions of the Political
27 Reform Act, found at Government Code Sections 81000 through 91014.

28 ///

1 **B. Regulation 18730 and Liability for Violation**

2 9. The Act requires every state and local agency to develop a Conflict of Interest Code.⁷ These
3 codes must designate those officials who participate in making decisions which may foreseeably have a
4 material financial effect on any financial interest belonging to that official and require those designated
5 officials to disclose all reportable interests on SEIs.⁸ The requirements of an agency’s Conflict of Interest
6 Code have the force of law, and any violations of those requirements is deemed a violation of the Act.⁹

7 **C. Duty to Timely File Assuming Office Statement of Economic Interest**

8 10. The Act requires all employees assuming designated positions to file statements of
9 economic interest (“SEI”) within 30 days after assuming office.¹⁰ Assuming Office SEIs shall disclose
10 any reportable investments, interests in real property, and business positions held on the date of assuming
11 office and income received during the 12 months prior to the date of assuming office or the date of being
12 appointed or nominated, respectively.¹¹

13 **D. Duty to Timely File Annual Statements of Economic Interest**

14 11. The Act requires every designated official to annually file a statement disclosing their
15 investments, interests in real property, and income by filing a SEI by April 1 of each year.¹² When April
16 1 falls on a weekend or holiday, the filing deadline is extended to the next regular business day.¹³ Failure
17 to comply with the disclosure requirements is a violation of the Act.¹⁴

18 **C. Conflict of Interest Code for Weed Rec and Parks District**

19 12. Weed Rec and Parks District Conflict of Interest Code designated Rec and Parks Governing
20 Board Members as a position requiring full disclosure.¹⁵ Therefore, this position requires completion of
21 all schedules, disclosing all investments, business positions, interests in real property, and sources of
22
23

24 ⁷ Section 87300.

25 ⁸ Section 87302, subd. (a).

26 ⁹ Section 87300.

27 ¹⁰ Section 87302, subd. (b).

28 ¹¹ Regulation 18370, subd. (b)(6)(B).

¹² Sections 87200 and 87203; Regulation 18723, subd. (b)(2).

¹³ Regulation 18116, subd. (a).

¹⁴ Section 87300.

¹⁵ Conflict of Interest Code for the Weed Rec and Parks District approved by Siskiyou County Board of Supervisors.

1 income.¹⁶ Siskiyou County incorporated by reference Regulation 18730 into its Conflict of Interest
2 Code.¹⁷

3 **E. Factors to be Considered by the Fair Political Practices Commission**

4 13. In framing a proposed order following a finding of a violation pursuant to Government
5 Code Section 83116, the Commission and the administrative law judge shall consider all the
6 surrounding circumstances including but not limited to the following factors set forth in Regulation
7 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the
8 specific violation; (2) The level of experience of the violator with the requirements of the Political
9 Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence
10 or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate,
11 negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the
12 Commission staff or any other governmental agency in a manner not constituting complete defense
13 under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern
14 and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and
15 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide
16 full disclosure.¹⁸

17 **GENERAL FACTS**

18 14. Williams was appointed as a Board Member to the Weed Rec and Parks District on May
19 11, 2020, for a four-year term. He is currently serving in the position.

20 15. Williams was required to file an Assuming Office SEI 30 days after assuming office by
21 the deadline of June 22, 2020, but failed to do so.

22 16. Siskiyou County's Filing Officer ("Filing Officer") notified Williams multiple times to
23 file an Assuming Office SEI. On April 21, 2020; May 12, 2020, June 17, 2020; August 26, 2020; and
24 November 16, 2020, the Filing Officer notified Williams by US mail and email of his duty to file.

25 17. Williams was required to timely file his 2020 Annual SEI by the April 1, 2021 deadline
26 but failed to file by the due date.

27 _____
¹⁶ *Ibid.*

¹⁷ *Ibid.*

¹⁸ Regulation 18361.5, subdivision (e).

1 18. The Filing Officer made multiple attempts to notify Williams of his duty file a 2020
2 Annual SEI. On January 25, 2021; February 9, 2021; March 4, 2021; March 27, 2021; April 9, 2021;
3 and May 12, 2021, the Filing Officer notified Williams by US mail and email of his obligation to file.
4 Williams did not respond to the requests or file his outstanding SEIs.

5 19. On June 7, 2021, the Filing Officer declared Williams as a non-filer and referred Williams
6 to the Enforcement Division.

7 20. Williams was required to timely file his 2021 Annual SEI by the April 1, 2022 deadline
8 and failed to file by the due date.

9 21. Williams was required to timely file his 2022 Annual SEI by the April 3, 2023 deadline
10 and failed to file by the due date.

11 22. The Enforcement Division made multiple attempts to obtain compliance. On January 6,
12 2022; January 27, 2022; February 11, 2022; April 25, 2022; October 31, 2023; November 7, 2023;
13 December 8, 2023; January 6, 2024; January 17, 2024; and January 23, 2024, the Enforcement Division
14 tried to contact Williams via email and left three voice messages on November 29, 2023; January 2,
15 2024; and January 23, 2024. Despite these attempts, Williams was unresponsive to these contacts.

16 23. To date, Williams has not filed any outstanding SEIs.

17 **PROCEDURAL HISTORY**

18 24. The Enforcement Division initiated an administrative action against Williams in this matter
19 by serving a packet containing a cover letter, a Report in Support of a Finding of Probable Cause (“PC
20 Report”), a fact sheet regarding probable cause proceedings, selected sections of the Government Code
21 regarding probable cause proceedings for the Commission, and selected regulations of the Commission
22 regarding probable cause proceedings.

23 25. Williams was served with the PC Report via certified mail on or about March 18, 2024.
24 The information contained in the PC Report packet advised Williams that he had 21 days in which to
25 request a probable cause conference, file a written response to the PC Report, or both. During the 21 days
26 that followed service of the PC Report, Williams did not file a response to the PC Report or request a
27 probable cause conference.
28

1 37. Complainant incorporates paragraphs 1–28 of this Accusation, as though completely set
2 forth herein.

3 38. Williams, as a designated official, had a duty under the Act to file a 2021 Annual SEI by
4 the April 1, 2021.

5 39. Williams failed to timely file his 2021 Annual SEI by the April 1, 2022 due date.

6 40. By failing to file his 2021 Annual SEI by the April 1, 2022 deadline, Williams violated
7 Government Code section 87203.

8 **Count 4**

9 **Failure to Timely File a 2022 Annual SEI**

10 41. Complainant incorporates paragraphs 1–28 of this Accusation, as though completely set
11 forth herein.

12 42. Williams, as a designated official, had a duty under the Act to file a 2022 Annual SEI by
13 the April 3, 2023.

14 43. Williams failed to timely file his 2022 Annual SEI by the April 3, 2023 due date.

15 44. By failing to file his 2022 Annual SEI by the April 3, 2023 deadline, Williams violated
16 Government Code section 87203.

17
18 **MITIGATING OR EXCULPATORY FACTORS**

19 45. The Enforcement Division is not aware of mitigating or exculpatory factors.
20

21 **PRAYER**

22 WHEREFORE, Complainant prays as follows:

23 1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and
24 Regulation 18361.5, and at such hearing find that Williams violated the Act as alleged
25 herein;

26 2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
27 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
28 Reform Act alleged in **Count 1**;

- 1 3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
3 Reform Act alleged in **Count 2**;
- 4 4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
6 Reform Act alleged in **Count 3**;
- 7 5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
9 Reform Act alleged in **Count 4**;
- 10 6. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision
11 (e), consider the following factors in framing a proposed order following a finding of a
12 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
13 by the specific violation; (2) The level of experience of the violator with the requirements
14 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
15 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
16 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
17 violator demonstrated good faith by consulting the Commission staff or any other
18 governmental agency in a manner not constituting complete defense under Government
19 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
20 whether the violator has a prior record of violations of the Political Reform Act or similar
21 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
22 amendments to provide full disclosure.
- 23 7. That the Fair Political Practices Commission grant such other and further relief as it deems
24 just and proper.

25
26 Dated: May 10, 2024

James M. Lindsay

James Lindsay, Chief of Enforcement
Fair Political Practices Commission

Exhibit A-10

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 May 10, 2024, I served the following document(s):

1. Statement to Respondent;
2. FPPC Case No. 22/007: Accusation;
3. Notice of Defense for Jeffrey Williams (Two Copies);
4. Selected Sections of the California Government Code, Administrative Procedure Act;
5. Consent to Electronic Service Agreement.

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 1:55 a.m./p.m.:

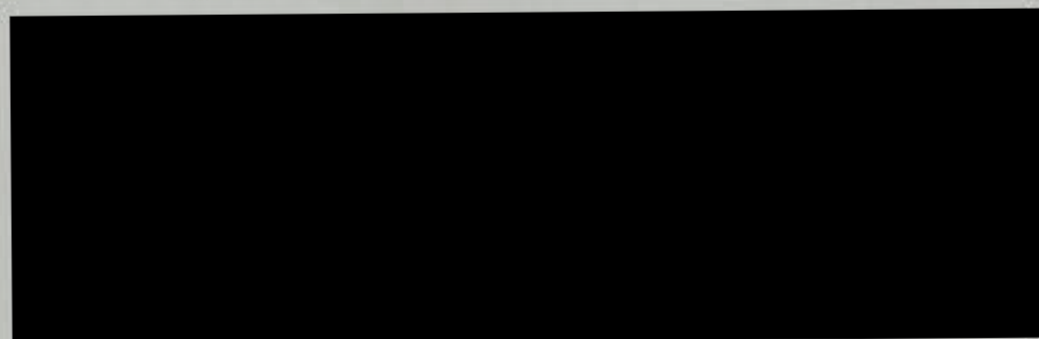
I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

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.**

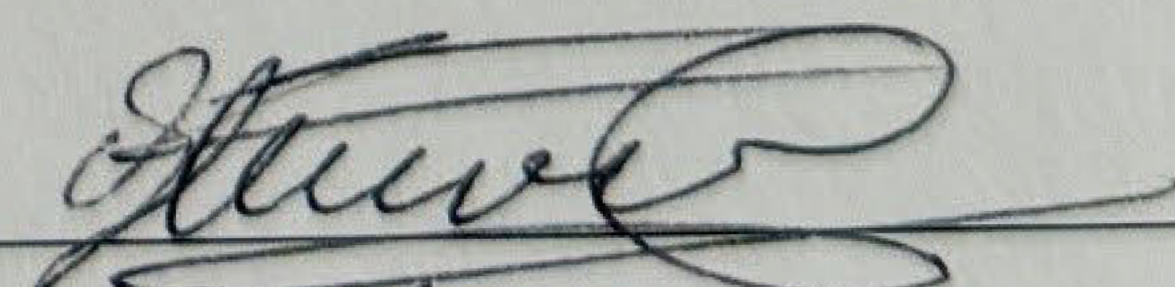
I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Jeffrey Williams



I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 10, 2024.



Suzanna Gevorkyan

Before the Fair Political Practices Commission

FPPC Case No 22/007

PROOF OF SERVICE

I, the undersigned, declare as follows:

I am a citizen of the United States, over the age of eighteen—and I am not a party to the above-referenced action.

My business address is: Po Box 294 Palo Cedro, CA 96073

On the below date I served the following items:

**Statement of Respondent; Accusation; Notice of
Defense; Consent to Electronic Service; Privacy Notice**

I served the above-listed item(s) as follows:

Personal Service. I personally delivered the above-listed document(s) as follows:

Person served: Jeffrey Williams

Place served: 161 E. Lincoln Ave
Weed, CA 96094

Date served: 6/11/24

Time served: 11:45AM

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

Date: 6/24/24



[SIGNATURE]

Todd Gusaas
Printed Name

Registration ID: Siskiyou #54

Exhibit A-11

1 JAMES M. LINDSAY
Chief of Enforcement
2 LAURA COLUMBEL
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q St, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5974
5 Email: LColumbel@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. 22/007
12)
13 JEFFREY WILLIAMS) **FIRST AMENDED ACCUSATION**
14)
15 Respondent.) (Gov. Code §11503)
16)
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 the Accusation in its official capacity and in the public interest.

23 2. The authority to bring the 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, specifically
25 including, but not limited to, Government Code Sections 83111, 83116, and 91000.5, which assign to the
26 Enforcement Division the duty to administer, implement, and enforce the provisions of the Political
27 Reform Act, found at Government Code Sections 81000 through 91014.

28 ///

1 **B. Regulation 18730 and Liability for Violation**

2 9. The Act requires every state and local agency to develop a Conflict of Interest Code.⁷ These
3 codes must designate those officials who participate in making decisions which may foreseeably have a
4 material financial effect on any financial interest belonging to that official and require those designated
5 officials to disclose all reportable interests on SEIs.⁸ The requirements of an agency’s Conflict of Interest
6 Code have the force of law, and any violations of those requirements is deemed a violation of the Act.⁹

7 **C. Duty to Timely File Assuming Office Statement of Economic Interest**

8 10. The Act requires all employees assuming designated positions to file statements of
9 economic interest (“SEI”) within 30 days after assuming office.¹⁰ Assuming Office SEIs shall disclose
10 any reportable investments, interests in real property, and business positions held on the date of assuming
11 office and income received during the 12 months prior to the date of assuming office or the date of being
12 appointed or nominated, respectively.¹¹

13 **D. Duty to Timely File Annual Statements of Economic Interest**

14 11. The Act requires every designated official to annually file a statement disclosing their
15 investments, interests in real property, and income by filing an SEI by April 1 of each year.¹² When April
16 1 falls on a weekend or holiday, the filing deadline is extended to the next regular business day.¹³ Failure
17 to comply with the disclosure requirements is a violation of the Act.¹⁴

18 **C. Conflict of Interest Code for Weed Rec and Parks District**

19 12. The Weed Rec and Parks District Conflict of Interest Code designates Rec and Parks
20 Governing Board Members as a position requiring full disclosure.¹⁵ Therefore, the position requires
21 completion of all schedules on the SEIs, disclosing all investments, business positions, interests in real
22
23

24 ⁷ Section 87300.

25 ⁸ Section 87302, subd. (a).

26 ⁹ Section 87300.

27 ¹⁰ Section 87302, subd. (b).

28 ¹¹ Regulation 18370, subd. (b)(6)(B).

¹² Sections 87200 and 87203; Regulation 18723, subd. (b)(2).

¹³ Regulation 18116, subd. (a).

¹⁴ Section 87300.

¹⁵ Conflict of Interest Code for the Weed Rec and Parks District approved by Siskiyou County Board of Supervisors.

1 property, and sources of Income.¹⁶ Siskiyou County incorporated by reference Regulation 18730 into its
2 Conflict of Interest Code.¹⁷

3 **E. Factors to be Considered by the Fair Political Practices Commission**

4 13. In framing a proposed order following a finding of a violation pursuant to Government
5 Code Section 83116, the Commission and the administrative law judge shall consider all the
6 surrounding circumstances including but not limited to the following factors set forth in Regulation
7 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the
8 specific violation; (2) The level of experience of the violator with the requirements of the Political
9 Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence
10 or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate,
11 negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the
12 Commission staff or any other governmental agency in a manner not constituting complete defense
13 under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern
14 and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and
15 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide
16 full disclosure.¹⁸

17 **GENERAL FACTS**

18 14. Williams was appointed as a Board Member to the Weed Rec and Parks District on May
19 22, 2020, for a four-year term. Williams is currently serving in the position.

20 15. Williams was required to file an Assuming Office SEI 30 days after assuming office by
21 the deadline of June 22, 2020, but failed to do so.

22 16. Siskiyou County's Filing Officer ("Filing Officer") notified Williams multiple times to
23 file an Assuming Office SEI. On April 21, 2020; May 12, 2020; June 17, 2020; August 26, 2020; and
24 November 16, 2020, the Filing Officer notified Williams by US mail and email of the obligation to file.
25 Williams did not respond to the requests or file the outstanding SEI.

26 //

27 _____
¹⁶ *Ibid.*

¹⁷ *Ibid.*

¹⁸ Regulation 18361.5, subdivision (e).

1 17. Williams was required to timely file the 2020 Annual SEI by the April 1, 2021 deadline
2 but failed to file by the due date.

3 18. The Filing Officer made multiple attempts to notify Williams of the duty file a 2020
4 Annual SEI. On January 25, 2021; February 9, 2021; March 4, 2021; March 27, 2021; April 9, 2021;
5 and May 12, 2021, the Filing Officer notified Williams by US mail and email of the obligation to file.
6 Williams did not respond to the requests or file the outstanding SEIs.

7 19. On June 7, 2021, the Filing Officer declared Williams as a non-filer and referred Williams
8 to the Enforcement Division.

9 20. Williams was required to timely file the 2021 Annual SEI by the April 1, 2022 deadline
10 and failed to file by the due date.

11 21. Williams was required to timely file the 2022 Annual SEI by the April 3, 2023 deadline
12 and failed to file by the due date.

13 22. Williams was required to timely file the 2023 Annual SEI by the April 2, 2024 deadline
14 and failed to file by the due date.

15 23. The Enforcement Division made multiple attempts to obtain compliance. From January 6,
16 2022 to September 18, 2024, the Enforcement Division tried to contact Williams eleven times via email
17 and left three voice messages on November 29, 2023; January 2, 2024; and January 23, 2024.
18 Additionally, Williams was personally served with an Accusation on June 11, 2024.¹⁹ Despite these
19 attempts, Williams continues to remain unresponsive to the Enforcement Division.

20 24. To date, Williams has not filed any outstanding SEIs.

21 **PROCEDURAL HISTORY**

22 25. The Enforcement Division initiated an administrative action against Williams in the matter
23 by serving a packet containing a cover letter, a Report in Support of a Finding of Probable Cause (“First
24 PC Report”), a fact sheet regarding probable cause proceedings, selected sections of the Government Code
25 regarding probable cause proceedings for the Commission, and selected regulations of the Commission
26 regarding probable cause proceedings.

27 ¹⁹An initial PC Report for four violations was served on Williams on March 18, 2024 and a Finding of Probable Cause
28 and Order to Prepare and Serve an Accusation (“First Order”) for Counts 1-4 was granted on April 18, 2024. An Accusation
was prepared and served on Williams for Counts 1-4 prior to the violation in Count 5 being referred to the Enforcement
Division. The First Amended Accusation includes Counts 1-5.

1 26. Williams was served with the First PC Report via certified mail on or about March 18,
2 2024. The information contained in the First PC Report packet advised Williams that he had 21 days in
3 which to request a probable cause conference, file a written response to the PC Report, or both. During
4 the 21 days that followed service of the First PC Report, Williams did not file a response to the First PC
5 Report or request a probable cause conference.

6 27. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
7 Accusation Be Prepared and Served (“First Ex Parte Request”), dated April 11, 2024, the Enforcement
8 Division submitted the matter to the Hearing Officer for a determination of probable cause.

9 28. On or about April 18, 2024, the Hearing Officer issued an order finding, based on the First
10 Ex Parte Request and the First PC Report, that there was probable cause to believe Williams violated the
11 Act and directed the Enforcement Division to issue an Accusation against Williams in accordance with
12 the finding.²⁰

13 29. The Enforcement Division sent to Williams on July 16, 2024 a second packet containing a
14 cover letter, a Report in Support of a Finding of Probable Cause (“Second PC Report”), a fact sheet
15 regarding probable cause proceedings, selected sections of the Government Code regarding probable
16 cause proceedings for the Commission, and selected regulations of the Commission regarding probable
17 cause proceedings.

18 30. Williams was served with the Second PC Report via certified mail on or about August 6,
19 2024.²¹ The information contained in the Second PC Report packet advised Williams that he had 21 days
20 in which to request a probable cause conference, file a written response to the PC Report, or both. During
21 the 21 days that followed service of the Second PC Report, Williams did not file a response to the Second
22 PC Report or request a probable cause conference.

23 31. By means of a Second Ex Parte Request for a Finding of Probable Cause and an Order that
24 an Accusation Be Prepared and Served (“Second Ex Parte Request”), dated September 9, 2024, the
25 Enforcement Division submitted the matter to the Hearing Officer for a determination of probable cause.
26

27 ²⁰ The First Ex Parte Finding of Probable Cause and Order was granted for Counts 1-4.

28 ²¹ The Second PC Report was returned to the Enforcement Division by the post office on August 6, 2024, in accordance with Section 83115.5.

1 32. On or about September 10, 2024, the Hearing Officer issued an order finding, based on the
2 Second Ex Parte Request and the Second PC Report, that there was probable cause to believe Williams
3 violated the Act and directed the Enforcement Division to issue an Accusation against Williams in
4 accordance with the finding.²²

5 **VIOLATIONS**

6 33. Williams committed 5 violations of the Act as follows:

7 **Count 1**

8 **Failure to Timely File an Assuming Office SEI**

9 34. Complainant incorporates paragraphs 1–33 of the Accusation, as though completely set
10 forth herein.

11 35. Williams, as a designated official, had a duty under the Act to file an Assuming Office SEI
12 by June 22, 2020.

13 36. Williams failed to timely file the Assuming Office SEI by the June 22, 2020 due date.

14 37. By failing to file the Assuming Office SEI by the June 22, 2020 deadline, Williams violated
15 Government Code section 87203.

16 **Count 2**

17 **Failure to Timely File a 2020 Annual SEI**

18 38. Complainant incorporates paragraphs 1–33 of the Accusation, as though completely set
19 forth herein.

20 39. Williams, as a designated official, had a duty under the Act to file a 2020 Annual SEI by
21 April 1, 2021.

22 40. Williams failed to timely file the 2020 Annual SEI by the April 1, 2021 due date.

23 41. By failing to file the 2020 Annual SEI by the April 1, 2021 deadline, Williams violated
24 Government Code section 87203.

25 //

26 //

27 //

28 ²² The Second Ex Parte Finding of Probable Cause and Order was granted for Count 5.

1 **Count 3**

2 **Failure to Timely File a 2021 Annual SEI**

3 42. Complainant incorporates paragraphs 1–33 of the Accusation, as though completely set
4 forth herein.

5 43. Williams, as a designated official, had a duty under the Act to file a 2021 Annual SEI by
6 April 1, 2022.

7 44. Williams failed to timely file the 2021 Annual SEI by the April 1, 2022 due date.

8 45. By failing to file the 2021 Annual SEI by the April 1, 2022 deadline, Williams violated
9 Government Code section 87203.

10 **Count 4**

11 **Failure to Timely File a 2022 Annual SEI**

12 46. Complainant incorporates paragraphs 1–33 of the Accusation, as though completely set
13 forth herein.

14 47. Williams, as a designated official, had a duty under the Act to file a 2022 Annual SEI by
15 April 3, 2023.

16 48. Williams failed to timely file the 2022 Annual SEI by the April 3, 2023 due date.

17 49. By failing to file the 2022 Annual SEI by the April 3, 2023 deadline, Williams violated
18 Government Code section 87203.

19 **Count 5**

20 **Failure to Timely File a 2023 Annual SEI**

21 50. Complainant incorporates paragraphs 1–33 of the Accusation, as though completely set
22 forth herein.

23 51. Williams, as a designated official, had a duty under the Act to file a 2023 Annual SEI by
24 April 2, 2024.

25 52. Williams failed to timely file the 2023 Annual SEI by the April 2, 2024 due date.

26 53. By failing to file the 2023 Annual SEI by the April 2, 2024 deadline, Williams violated
27 Government Code section 87203.

1 **MITIGATING OR EXCULPATORY FACTORS**

2 54. The Enforcement Division is not aware of mitigating or exculpatory factors.

3 **PRAYER**

4 WHEREFORE, Complainant prays as follows:

- 5 1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and
6 Regulation 18361.5, and at such hearing find that Williams violated the Act as alleged
7 herein;
- 8 2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
9 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
10 Reform Act alleged in **Count 1**;
- 11 3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
12 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
13 Reform Act alleged in **Count 2**;
- 14 4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
15 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
16 Reform Act alleged in **Count 3**;
- 17 5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
18 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
19 Reform Act alleged in **Count 4**;
- 20 6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
21 order Williams to pay a monetary penalty of up to \$5,000 for the violation of the Political
22 Reform Act alleged in **Count 5**;
- 23 7. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
24 order Williams to file the outstanding SEIs alleged in **Counts 1-5**.
- 25 8. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision
26 (e), consider the following factors in framing a proposed order following a finding of a
27 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
28 by the specific violation; (2) The level of experience of the violator with the requirements

1 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
2 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
3 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
4 violator demonstrated good faith by consulting the Commission staff or any other
5 governmental agency in a manner not constituting complete defense under Government
6 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
7 whether the violator has a prior record of violations of the Political Reform Act or similar
8 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
9 amendments to provide full disclosure.

- 10 9. That the Fair Political Practices Commission grant such other and further relief as it deems
11 just and proper.

12
13 Dated: October 7, 2024

James M. Lindsay

James Lindsay, Chief of Enforcement
Fair Political Practices Commission

Exhibit A-12

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 October 7, 2024, I served the following document(s):

1. Statement to Respondent;
2. FPPC Case No. 22/007: Accusation;
3. Notice of Defense for Jeffrey Williams (Two Copies);
4. Selected Sections of the California Government Code, Administrative Procedure Act;
5. Consent to Electronic Service Agreement.

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 1:05 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

Jeffrey Williams

██████████

██████████

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 7, 2024.

Suzanna Gevorkyan

Suzanna Gevorkyan

Before the Fair Political Practices Commission

FPPC Case No 22/007

PROOF OF SERVICE

I, the undersigned, declare as follows:

I am a citizen of the United States, over the age of eighteen—and I am not a party to the above-referenced action.

My business address is:

Po Box 294 Palo Cedro, CA 96073

On the below date I served the following items:

Statement to Respondent

I served the above-listed item(s) as follows:

Personal Service. I personally delivered the above-listed document(s) as follows:

Person served: Jeffrey Williams

Place served:



Date served: 10/13/24

Time served: 9:08 AM

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

Date: 10/14/24

A handwritten signature in blue ink, appearing to read "Todd Gusaas", written over a horizontal line.

[SIGNATURE]

Todd Gusaas
Printed Name

Registration ID: Siskiyou #54

Exhibit A-13



Siskiyou County
510 N. Main St.
Yreka, California, 96097
(530)842-8084

Laura Bynum
County Clerk

April 9, 2021

Jeffrey Williams

**Subject: Statement of Economic Interests - Notice of Non-Filing
FIRST NON-FILER NOTIFICATION**

Dear Jeffrey Williams:

According to our records, your Statement of Economic Interests, Form 700 as Governing Board Member for Weed Rec and Parks District which was due on April 1, 2021, has not been received. Please file immediately. The deadline cannot be extended.

Government Code Section 91013 imposes a \$10.00 per day fine up to a maximum of \$100.00 for the late filing of a Statement of Economic Interests. However, if you file your statement within 30 days of the date of this letter and attach an explanation for the late filing, all or part of the fine can be waived. State law prohibits the waiving of any portion of a fine if the statement is not filed within 30 days of this letter.

You are eligible to use the new eDisclosure system (hyperlink below) to complete and submit your Form 700 electronically

Please view a short 'How -to' video :

<http://www.southtech-tutorials.com/eDisclosure/FilerDemo/tutorial.html>

Then login to eDisclosure and file:

eDisclosure System: <https://www.southtechhosting.com/SiskiyouCounty/eDisclosure/>

Your Login ID: [REDACTED]

Password:

Existing Filers (have previously logged into the system) - If you have previously logged into the system, you have created your own password. If you have forgotten your password, please use the "Forgotten Password" feature on the eDisclosure home page.

New Filers (have never logged into the system) - If you are a new filer, please refer to your "Conflict of Interest eFile Account Creation" email previously sent to you which included a temporary password. Once you log into the system, you will need to create a new password and answer a security question. If you have deleted the email, please contact your Filing Official listed below and ask them to reset your password which you will receive by email.

If you have any questions regarding this letter, please contact me.

Sincerely,
Laura Bynum
(530)842-8084



Siskiyou County
510 N. Main St.
Yreka, California, 96097
(530)842-8084

Laura Bynum
County Clerk

May 12, 2021

Jeffrey Williams
Weed Rec and Parks District
80 W. Inez St.
Weed, CA 96094

**Subject: Statement of Economic Interests - Statement Not Filed Within 30 Days of First Notice
SECOND NON-FILER NOTIFICATION**

Dear Jeffrey Williams:

According to our records, on April 9, 2021, you were notified that we did not receive your Statement of Economic Interest, Form 700, as Governing Board Member for Weed Rec and Parks District, which was due on April 1, 2021. We advised you to file your statement within 30 days. However, to date we have not received your statement.

Government Code Section 91013 provides that any person who files a statement after its deadline shall be liable in the amount of \$10.00 per day, up to a maximum of \$100.00. Furthermore, the Siskiyou County prohibits the waiving of any portion of the liability if the statement is not filed within 30 days after the Siskiyou County sends you specific written notice of the filing requirement.

Therefore, your Statement of Economic Interests, Form 700 must be completed and returned along with a check or money order in the amount of \$100.00 made payable to the Siskiyou County. Forms and instructions are available online at <http://www.fppc.ca.gov/>.

Please send Form 700 and check/money order to:

Siskiyou County Clerk's Office
510 N. Main St.
Yreka, California, 96097

If we have not heard from you within 10 days from the date of this letter, this matter will be referred to the appropriate enforcement authority.

If you have any questions or need assistance regarding this letter, or obtaining appropriate forms, please contact Laura Bynum at (530)842-8084.



Siskiyou County
510 N. Main St.
Yreka, California, 96097
(530)842-8084

Laura Bynum
County Clerk

June 7, 2021

Fair Political Practices Commission
Enforcement Division
1102 Q Street, Suite 3000
Sacramento, CA 95811

Subject: Siskiyou County - Non-Filer Enforcement Referral

Enclosed please find the enforcement referral packet for Jeffrey Williams. Please be advised that our office has declared Jeffrey Williams as a non-filer.

According to our records this filer has failed to file the Statement of Economic Interests, Form 700 as Governing Board Member for Weed Rec and Parks District which was due on June 22, 2020.

If you have any questions or need additional information, please contact Laura Bynum at (530)842-8084.

Sincerely,
Laura Bynum
County Clerk

By: 
Your Agency Filing Official

Enclosures
Certified Mail Receipt # _____



Siskiyou County
510 N. Main St.
Yreka, California, 96097
(530)842-8084

Laura Bynum
County Clerk

June 7, 2021

Fair Political Practices Commission
Enforcement Division
1102 Q Street, Suite 3000
Sacramento, CA 95811

Subject: Siskiyou County - Non-Filer Enforcement Referral

Enclosed please find the enforcement referral packet for Jeffrey Williams. Please be advised that our office has declared Jeffrey Williams as a non-filer.

According to our records this filer has failed to file the Statement of Economic Interests, Form 700 as Governing Board Member for Weed Rec and Parks District which was due on April 1, 2021.

If you have any questions or need additional information, please contact Laura Bynum at (530)842-8084.

Sincerely,
Laura Bynum
County Clerk

By: 
Your Agency Filing Official

Enclosures

Certified Mail Receipt # _____



History Of Letters, Calls, E-mails and Notes

User Name	Date and Time	Comments	Type	Email
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Filer - Williams Jeffrey

Governing Board Member, Weed Rec and Parks District, Special Districts

Gray Shelley	04/21/2020 10:03:23 AM	Letter sent - Assuming Office - Letter.	Letter	
Gray Shelley	04/21/2020 10:03:23 AM	Letter sent - No Email.	Letter	
Gray Shelley	04/23/2020 03:38:16 PM	A man by the same name as the Filer called to say he received a letter but he's not the correct Jeff Williams whose on this board. I emailed Kim at the District office to request residence and email address for Filer.	Note	
Gray Shelley	04/27/2020 11:24:23 AM	I texted him to get mailing address—will forward to you asap.His email is [REDACTED] Kim GreeneDirector	Email	
System	05/12/2020 11:09:18 AM	CONFLICT OF INTEREST FORM 700 - ASSUMING OFFICE	Auto Email	[REDACTED]
Gray Shelley	05/12/2020 11:10:08 AM	Setup new filer for start date of 5/11/2020. Original appointment date was 4/16/2020; however, filer was not a registered voter. Reset password.	Note	
Gray Shelley	05/12/2020 11:23:46 AM	Setup new filer with email reflected in voter registration. Referenced back to a prior email from the district with a different email.	Note	
System	05/12/2020 11:25:29 AM	CONFLICT OF INTEREST FORM 700 - ASSUMING OFFICE	Auto Email	[REDACTED]
Gray Shelley	05/12/2020 11:26:11 AM	Reset password again but for the new email address of [REDACTED]	Note	
Gray Shelley	05/22/2020 08:58:34 AM	Revd a new Notice of Appointment for Filer and rather than use the date of 5/11/2020 (when he registered to vote), the new Notice had a different date. Updated Filers records.	Note	
System	06/17/2020 08:00:00 AM	Letter emailed - Filing Reminder Notification - 5 Days.	Letter Emailed	[REDACTED]
Isom Jennifer	08/26/2020 08:22:48 AM	Letter emailed - Notice of Non-Filing (First Notification) - Email.	Letter Emailed	[REDACTED]
Isom Jennifer	11/16/2020 08:47:17 AM	Letter sent - Notice of Non-Filing (Second Notification) - Letter.	Letter	
Thomas Nichole	01/25/2021 03:46:48 PM	Letter emailed - Annual Filing Notification Email 1 - To eDisclosure Filers.	Letter Emailed	[REDACTED]
Thomas Nichole	02/09/2021 01:42:39 PM	Letter emailed - Annual Filing Deadline Extension due to COVID-19.	Letter Emailed	[REDACTED]
Thomas Nichole	03/04/2021 01:03:13 PM	Letter emailed - Annual Filing Notification Reminder Email.	Letter Emailed	[REDACTED]
System	03/27/2021 08:00:00 AM	Letter emailed - Filing Reminder Notification - 5 Days.	Letter Emailed	[REDACTED]



History Of Letters, Calls, E-mails and Notes

User Name	Date and Time	Comments	Type	Email
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Filer - Williams Jeffrey

Styers Julie	04/09/2021 04:56:05 PM	Letter emailed - Notice of Non-Filing (First Notification) - Email.	Letter Emailed	[REDACTED]
Thomas Nichole	05/12/2021 02:18:08 PM	Letter sent - Notice of Non-Filing (Second Notification) - Letter.	Letter	
Barkman Julie	06/07/2021 02:22:47 PM	Letter sent - Notice of Non-Filing FPPC Enforcement Referral - Letter.	Letter	
Barkman Julie	06/07/2021 02:22:47 PM	Letter sent - Notice of Non-Filing FPPC Enforcement Referral - Letter.	Letter	

Grand Total: 21

Exhibit A-14

Weed Recreation & Parks District

BOARD OF DIRECTORS - REGULAR MEETING AGENDA

Thursday, October 17, 2024 – 6:30 p.m.

WEED COMMUNITY CENTER

161 East Lincoln Avenue, Weed, CA 96094

- 1) CALL TO ORDER:** The Regular Meeting of the Board of the Weed Recreation and Parks District will be called to order and attendance will be recorded.
 - i. Call to Order
 - ii. Roll Call: Paula Rosetto; Sue Tavalero; Martin Nicholas; Alan Shoemaker; Jeffery Williams

- 2) OATH OF OFFICE:** The Oath of Office will be administered to incoming Board Member Alan Shoemaker.

- 3) APPROVAL OF MINUTES:** The Board will consider approval of the minutes from the September 11, 2024 Special Meeting and the September 19, 2024 Regular Board Meeting.

- 4) PUBLIC COMMENT:** The opportunity to comment at public meetings is governed by the State of California Brown Act. By definition, this is an opportunity for the Board to learn the concerns and views of the public. The Board is not able, under the Brown Act, to engage in any level of conversation or discussion on the comments. The Board may direct staff to follow up on the item with the speaker or may direct that the item be placed on the agenda of a future meeting for discussion. Three minutes will be allotted to each speaker and twenty minutes to each subject matter. Non-English speakers are entitled to at least twice the time which is normally allotted to a member of the public who wishes to publicly comment when a translator is used.

Anyone wishing to address the Board on an agenda or non-agenda item that is within the jurisdiction of the Board may do so by completing the Open Forum form and submitting a copy to the Board Secretary. Speakers will be recognized by the Board President.

5) NEW BUSINESS – ACTION ITEMS

- a. **Job Description – Office Coordinator:** The Board will consider approval of an Office Coordinator job description.

6) Discussion

- a. **New Discussion Items:** New discussion topics will be discussed under this item. There are no new discussion topics for this meeting.
 - i. **Weed Union Elementary School District Measure Y Presentation** – Jon Ray, Principal/Superintendent will give a presentation on the WUESD's bond Measure Y.
- b. **Continued:** Discussion topics brought up at previous meeting can be revisited under this item. There are no continued discussion items for this meeting.
 - i. **Community Garden** – C.J. Rodriguez will provide more details about his idea for a community garden at Charlie Byrd and Carrick Parks.
 - ii. **Bocce Ball Court Cover:** An update will be provided regarding the Bocce Ball Court cover project.
 - iii. **1st Quarter Budget Review:** The Board will review the 1st Quarter income and expenditures.

7) STAFF REPORTS/CURRENT PROJECTS/RECOMMENDATIONS: District Managers will update the Board on events, activities, and important information.

- a. Maintenance Supervisor-Zeke Zanotto

- b. District Administrator - Nancy Miller

8) BOARD MEMBER REPORTS: Each Board Member will have an opportunity to report on activities relating to WRPD business.

9) CLOSED SESSION

- a. **Public Employee Appointment, Discipline, Dismissal & Release** – [Pursuant to Government Code Section 54957]
- b. **Public Employee Performance Evaluation**-Ongoing Review of Goals and Objectives (pursuant to Gov Code Section 54957) District Administrator.

- c. **Reconvene to Open Session:** The Board will reconvene in Open Session.
- d. **Action from Closed Session:** The Board will reconvene in Open Session and announce any action taken in closed session.

10) NEXT BOARD MEETING DATES: The Board's next two regular meeting will be held on:

- a. November 21, 2024 @ 6:30pm
- b. December 19, 2024 @ 6:30 p.m.

11) ADJOURN THE MEETING

Exhibit A-15



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

December 24, 2024

Jeffrey Williams
[REDACTED]

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC No. 22/0007 In the Matter of Jeffrey Williams

Dear Jeffrey Williams:

On October 13, 2024, you were personally served with a first amended 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 January 16, 2025. 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 February 13, 2025 and impose an administrative penalty of \$22,500 against you.

Following the issuance of the default, the Commission will obtain a judgment in superior court for the amount owed and then take action to collect the judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

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) 237-5974 or lcolumbel@fppc.ca.gov if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

Laura Columbel
Commission Counsel
Enforcement Division

¹ Government Code section 11505.

Exhibit A-16



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

January 30, 2025

Jeffrey Williams
[REDACTED]

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC Case No. 22/00007; In the Matter of Jeffrey Williams

Dear Jeffrey Williams:

On October 13, 2024, you were personally served with a first amended 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 January 16, 2025. The Commission will be asked to adopt the default at its public meeting scheduled for February 13, 2025 and impose an administrative penalty of \$22,500 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on February 13, 2025 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.

///

This letter is your last opportunity to resolve this matter informally by way of a stipulated

¹ Government Code Section 11505.

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 February 13, 2025 meeting. Please contact me at (279) 237-5974 or lcolumbel@fppc.ca.gov if you wish to enter into a negotiated settlement.

Sincerely,

Laura Columbel
Commission Counsel
Enforcement Division

Enclosures: Default Decision and Order, Exhibit 1 and attachments