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

10
11 In the Matter of

12 CHRISTOPHER HOLDEN,

13 Respondent.

FPPC Case No. 2019-00429

STIPULATION, DECISION AND ORDER

Date Submitted to Commission: March 2024

14
15 **INTRODUCTION**

16 Christopher Holden is a member of the California State Assembly, District 41. (He first was
17 elected in 2012—and has been re-elected every two years since.) This case involves failure to timely file
18 Form 803 behested payment reports regarding approximately 94 charitable payments (of \$5,000 or
19 more)—totaling approximately \$1,576,500—made to the California Legislative Black Caucus Policy
20 Institute (“Institute”), in violation of the Political Reform Act.¹ The Institute is a charitable Internal
21 Revenue Code section 501(c)(3) organization that raises money to provide scholarships for high school
22 students who need financial assistance to attend college. At the time, Holden served as Chair of the
23 Legislative Black Caucus and as Chair of the Institute. The payments were made in 2017 and 2018 by
24 more than six-dozen donors to the Institute at Holden’s behest, in his capacity as Chair of the Institute.
25 This case was opened after Holden filed the late reports on his own initiative, and after the late-filed

26
27 ¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000
28 through 91014. All statutory references are to this code. The regulations of the Fair Political Practices Commission are
contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to
this source.

1 Form 803 behested payment reports were provided to the Fair Political Practices Commission by the
2 Assembly Rules Committee. (Within 30 days of receiving such reports, state agencies are required to
3 forward them to the Commission.²)

4 **SUMMARY OF THE LAW**

5 The Act and its regulations are amended from time to time. All legal references and discussions
6 of law are intended to be citations to statutes and regulations as they existed at the time of the violations
7 noted above.

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

9 When enacting the Political Reform Act, the people of California found and declared that
10 previous laws regulating political practices suffered from inadequate enforcement by state and local
11 authorities.³ Thus, it was decreed that the Act “should be liberally construed to accomplish its
12 purposes.”⁴

13 Payments made at the behest of elected officials—including charitable donations—are a means
14 by which donors may seek to gain favor with elected officials. One purpose of the Act is to ensure
15 timely, transparent reporting of such activity, which serves to increase public awareness regarding
16 potential attempts to influence in this manner.⁵

17 Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will
18 be “vigorously enforced.”⁶

19 **Required Filing of Behested Payment Reports**

20 When one individual or organization makes a charitable donation (or donations) to another—at
21 the behest of an elected officer—the officer is required to disclose the payment(s) on a Form 803
22 behested payment report, which must be filed with the officer’s agency within 30 days following the date
23 on which the payment(s) equal or exceed \$5,000 in the aggregate from the same source in the same

24
25 ² Section 82015, subdivision (b)(2)(B)(iii), as in effect prior to 2018; Section 84224, subdivision (a), as in effect after 2017.

26 ³ Section 81001, subdivision (h).

27 ⁴ Section 81003.

28 ⁵ See Sections 82004.5, 82041.3, and 84224, as in effect after 2017; and 82015, subdivision (b)(2)(B)(iii), as in effect before 2018.

⁶ Section 81002, subdivision (f).

1 calendar year. The report is a public record, which must include the name and address of the payor, the
2 amount of the payment, the date of payment, the name and address of the payee, a brief description of the
3 goods or services provided or purchased (if any), and a description of the specific purpose or event for
4 which the payment or payments were made. Once the \$5,000 aggregate threshold from a single source
5 has been reached for a calendar year, all payments for the calendar year made by that source must be
6 disclosed within 30 days after the date the threshold was reached or the payment was made, whichever
7 occurs later.⁷

8 These rules apply when the payment is “made at the behest” of the officer. This means that the
9 payment is made under any one (or more) of the following circumstances:⁸

- 10 1. at the request, suggestion, or direction of the officer (or his agent);
- 11 2. in concert with the officer (or his agent);
- 12 3. with the express, prior consent of the officer (or his agent);
- 13 4. in cooperation, consultation, or coordination with the officer (or his agent); or
- 14 5. under the control of the officer (or his agent).

15 An officer “has a duty to be informed of payments made at his behest, and must make an effort to
16 file required forms as soon as possible.”⁹ This is a duty to make reasonable inquiry.

17 **SUMMARY OF THE FACTS**

18 In 2017 and 2018, Holden was a member of the California State Assembly, and he was Chair of
19 the California Legislative Black Caucus. As Chair of the Black Caucus, he also served as the Chair of
20 the Institute. During this time, numerous charitable donations of \$5,000 or more were made to the
21 Institute at Holden’s behest in his role as Chair of the Institute. Holden was required to file a Form 803
22 behested payment report with the California State Assembly within 30 days of each payment, but he
23 failed to do so. His reports were filed from 20 to 276 days late, as summarized in the following chart
24 (which includes the oldest activity that may be charged under the tolling agreement that Holden entered
25 into with Enforcement regarding the statute of limitations):

26
27 ⁷ See Sections 82004.5, 82041.3, and 84224, as in effect after 2017; and 82015, subdivision (b)(2)(B)(iii), as in effect before 2018.

28 ⁸ Regulation 18215.3, subdivision (a).

⁹ See: [John St. Croix Advice Letter \(I-13-107\)](#), page 4.

Donor	Amount	Payment Date	Filing Due Date	Date Filed
Altria Client Services, LLC	\$50,000	5/26/17	6/25/17	3/28/18
PHRMA	\$100,000	5/26/17	6/25/17	3/28/18
Chevron Products Company	\$40,000	6/30/17	7/29/17	3/28/18
American Beverage Association	\$10,000	7/10/17	8/9/17	3/28/18
United Nurses Assoc. of CA/Union of Health Care Prof. Issues	\$25,000	7/10/17	8/9/17	3/28/18
SEIU Local 2015 Issues PAC	\$25,000	7/28/17	8/27/17	3/28/18
Members Voice of the State Building and Construction Trades Council	\$10,000	8/11/17	9/10/17	3/28/18
California Real Estate PAC	\$10,000	8/15/17	9/14/17	3/28/18
Santa Ynez Band of Mission Indians	\$10,000	8/15/17	9/14/17	3/28/18
Barona Band of Mission Indians	\$10,000	8/16/17	9/15/17	3/28/18
Wells Fargo and Company	\$10,000	8/16/17	9/15/17	3/28/18
California Teachers Association (CTA)	\$10,000	8/17/17	9/16/17	3/28/18
AMGEN Inc State PAC	\$15,000	8/18/17	9/17/17	3/28/18
Association of California School Administrators Issues PAC	\$15,500	8/18/17	9/17/17	3/28/18
IBEW Local 11 PAC	\$20,000	8/18/17	9/17/17	3/28/18
IBEW Local 18 Water & Power Defense League	\$10,000	8/18/17	9/17/17	3/28/18
Charter Communications	\$10,000	8/22/17	9/21/17	3/28/18
South Coast Air Quality Management District	\$10,000	8/23/17	9/22/17	3/28/18
Ghost Management Group LLC	\$10,000	8/29/17	9/28/17	3/28/18
RAI Services Company	\$15,000	9/6/17	10/5/17	3/28/18
AT&T	\$10,000	9/7/17	10/6/17	3/28/18
California Correctional Peace Officers	\$5,000	9/7/17	10/6/17	3/28/18
Eaze Solutions, Inc.	\$15,000	9/8/17	10/7/17	3/28/18
San Manuel Band of Mission Indians	\$15,000	9/11/17	10/10/17	3/28/18
Microsoft	\$15,000	9/12/17	10/11/17	3/28/18
CA Apartment Association PAC	\$15,000	9/21/17	10/20/17	3/28/18
United Domestic Workers of America Issues PAC	\$20,000	9/25/17	10/24/17	3/28/18
CA Credit Union League	\$15,000	9/26/17	10/25/17	3/28/18
California Dental PAC, SCC	\$15,000	9/26/17	10/25/17	3/28/18
Matt Dababneh for Assembly 2018	\$5,000	10/1/17	9/30/17	3/28/18
CSLEA Issues Committee	\$15,000	10/2/17	11/1/17	3/28/18
Anheuser Busch	\$10,000	10/10/17	11/9/17	3/28/18
AFSCME	\$15,000	10/11/17	11/10/17	3/28/18
Chevron	\$10,000	10/11/17	11/10/17	3/28/18
Community Loans of America, Inc.	\$10,000	10/11/17	11/10/17	3/28/18
Association of California State Supervisors PAC	\$10,000	10/12/17	11/11/17	3/28/18
Consumer Attorneys Public Interest Foundation	\$10,000	10/12/17	11/11/17	3/28/18
Anthem Inc.	\$15,000	10/16/17	11/15/17	3/28/18
DaVita (two payments)	\$15,000	10/16/17	11/15/17	3/28/18
Dish	\$10,000	10/16/17	11/15/17	3/28/18
CA Beer & Beverage Distributors Community Affairs (two payments)	\$30,000	10/18/17	11/17/17	3/28/18
California Cable & Telecommunications Association	\$15,000	10/18/17	11/17/17	3/28/18
Charter Communications	\$15,000	10/18/17	11/17/17	3/28/18
USAA	\$10,000	10/19/17	11/18/17	3/28/18
Anheuser Busch	\$30,000	10/25/17	11/24/17	3/28/18
Kelly Boyd Momoh	\$7,500	10/25/17	11/24/17	3/28/18
Farmers Insurance	\$15,000	10/26/17	11/25/17	3/28/18
Verizon	\$25,000	10/26/17	11/25/17	3/28/18
CA Apartment Association PAC	\$5,000	10/31/17	11/30/17	3/28/18
Verizon	\$9,000	11/1/17	12/1/17	3/28/18
IUPAT PAC	\$10,000	11/8/17	12/7/17	3/28/18

Donor	Amount	Payment Date	Filing Due Date	Date Filed
Pacific Gas and Electric Company	\$10,000	11/8/17	12/7/17	3/28/18
AERA Energy LLC	\$15,000	11/14/17	12/13/17	3/28/18
Pacific Gas and Electric Company	\$25,000	11/15/17	12/14/17	3/28/18
21 st Century Fox America, Inc.	\$15,000	11/20/17	12/19/17	3/28/18
AT&T	\$25,000	11/21/17	12/20/17	3/28/18
CA Medical Association PAC	\$10,000	11/21/17	12/20/17	3/28/18
Members' Voice of the State Building and Construction Trades Council of CA	\$15,000	11/21/17	12/20/17	3/28/18
PG&E Corporation Foundation	\$25,000	11/21/17	12/20/17	3/28/18
Sempra Energy	\$7,500	11/21/17	12/20/17	3/28/18
California Apartment Association	\$10,000	11/27/17	12/26/17	3/28/18
California Charter Schools Association	\$6,000	11/27/17	12/26/17	3/28/18
Comcast Financial Agency Corporation	\$25,000	11/27/17	12/26/17	3/28/18
SoCalGas	\$7,500	11/27/17	12/26/17	3/28/18
Innocean	\$75,000	11/30/17	12/29/17	3/28/18
CalChambers	\$15,000	12/14/17	1/13/18	3/28/18
Shell Oil Company	\$15,000	12/15/17	1/14/18	3/28/18
Abbott Laboratories	\$15,000	12/18/17	1/17/18	3/28/18
Calpine Corporation	\$15,000	12/19/17	1/18/18	3/28/18
Sutter Health	\$20,000	12/20/17	1/19/18	3/28/18
CA State Council of Service Employees	\$25,000	12/21/17	1/20/18	3/28/18
California State Pipe Trades Council	\$5,000	12/21/17	1/20/18	3/28/18
California Charter Schools Association Advocates	\$6,000	12/24/17	1/23/18	3/28/18
MSG Sports and Entertainment, LLC	\$20,000	12/27/17	1/26/18	3/28/18
So Cal Edison	\$50,000	12/27/17	1/26/18	3/28/18
Dart Container	\$15,000	1/5/18	2/4/18	3/28/18
CA Cannabis Industry Association	\$5,000	1/25/18	2/24/18	3/28/18
California Assoc. of Hospitals and Health	\$10,000	1/25/18	2/24/18	3/28/18
Visa	\$25,000	1/25/18	2/24/18	3/28/18
Charter Communications	\$5,000	1/29/18	2/28/18	3/28/18
Pechanga Band of Luiseno Indians	\$5,000	1/29/18	2/28/18	3/28/18
SEIU United Healthworkers – West	\$5,000	2/2/18	3/1/18	3/28/18
KP Financial SVCS OPS	\$10,000	2/9/18	3/8/18	3/28/18
AFSCME, AFL-CIO, Council 36 PAC	\$5,000	4/24/18	5/24/18	12/4/18
Intuit, Inc.	\$25,000	7/16/18	8/15/18	12/4/18
San Manuel Band of Mission Indians	\$15,000	7/17/18	8/16/18	12/4/18
21 st Century Fox America, Inc.	\$15,000	8/23/18	9/24/18	12/4/18
Anheuser Busch	\$30,000	8/23/18	9/24/18	12/4/18
CA Cable & Telecommunications Association	\$15,000	8/23/18	9/24/18	12/4/18
Chevron Products Company	\$50,000	8/23/18	9/24/18	12/4/18
Comcast Corporation	\$20,000	8/23/18	9/24/18	12/4/18
Eli Lilly and Company	\$15,000	8/23/18	9/24/18	12/4/18
General Motors LLC	\$5,000	8/23/18	10/1/18	12/4/18
Kelly Boyd Momoh	\$7,500	8/23/18	10/1/18	12/4/18
TOTAL: \$1,576,500				

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1 **VIOLATIONS**

2 **Counts 1 - 16: Failure to Timely File Behested Payment Reports**

3 In this way, Holden violated Section 82015, subdivision (b)(2)(B)(iii), as in effect prior to 2018—
4 and Section 84224, as in effect after 2017. For settlement purposes, 16 counts are being charged (as
5 discussed in more detail below).

6 **STREAMLINE EXCLUSION**

7 This case is excluded from the streamline settlement program because—due to the number of
8 behested payment reports that were late-filed and the total amount of those behested payments—the
9 extent and gravity of the public harm in the aggregate is more than minimal.¹⁰

10 **PROPOSED PENALTY**

11 The maximum penalty that may be imposed per count is \$5,000.¹¹ In this case, 16 counts are
12 recommended. The maximum penalty for the counts charged is \$80,000.

13 In determining the appropriate penalty for a particular violation of the Act, the Enforcement
14 Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an
15 emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division
16 considers the facts and circumstances of the violation in the context of the following factors:¹²

- 17 1. the extent and gravity of the public harm caused by the specific violation;
- 18 2. the level of experience of the violator with the requirements of the Act;
- 19 3. penalties previously imposed by the Commission in comparable cases;
- 20 4. the presence or absence of any intention to conceal, deceive or mislead;
- 21 5. whether the violation was deliberate, negligent or inadvertent;
- 22 6. whether the violator demonstrated good faith by consulting Commission staff or any other
23 governmental agency in a manner not constituting a complete defense under Section 83114,
subdivision (b);
- 24 7. whether the violation was isolated or part of a pattern—and whether the violator has a prior
record of violations of the Act or similar laws; and
- 25 8. whether the violator, upon learning of a reporting violation, voluntarily filed amendments to
26 provide full disclosure.

27 ¹⁰ Regulation 18360.1, subdivision (c)(2)(B)(v).

¹¹ See Section 83116, subdivision (c).

28 ¹² These factors are set forth in Regulation 18361.5, subdivision (e)(1) through (8).

1 Behested payments can be a means by which donors may seek to gain favor with elected officials.
2 Such payments are lawful, but timely reporting is required, as it affords the public an opportunity to
3 assess the propriety of the behested payments—and in turn, this scrutiny serves to inhibit improper
4 practices.¹³ There is inherent public harm in non-disclosure and late reporting, because the public is
5 deprived of a timely opportunity to scrutinize the payments. Without such scrutiny, improper practices
6 are not inhibited. The Commission has found timely disclosure to be essential.

7 A number of donors to the Institute have business before the Legislature in virtually every
8 legislative session. However, there is no indication that these behested payments were related to their
9 legislative activities.

10 In this case, Holden’s violations appear to be the result of negligence. The case was opened based
11 on two sets of filings that were provided to the Fair Political Practices Commission by the Assembly
12 Rules Committee after Holden filed the reports. These included Holden’s Form 803 filings for each of
13 the payments noted in the chart above, which were filed from 20 to 276 days late. (Reports for about one-
14 half of the payments were filed from 120 to 276 days late.) Each filing included the identity of the donor,
15 identity of the recipient, amount of the donation, date of payment, and the date that the Form 803 report
16 was filed with Holden’s agency. Filing dates were compared to the reported dates of payments—meaning
17 that the violations in this case were apparent from the face of the filings.

18 Holden maintains that, by filing the reports, he took responsibility for the Institute as a whole,
19 “including funds raised by a professional fundraiser,” and not by him personally. However, each
20 behested payment report was executed by Holden under penalty of perjury, and in connection with this
21 settlement, Holden acknowledges that the above-noted payments were in fact made at his behest.

22 While serving as Chair of the Institute, Holden maintains that he directed an internal audit to be
23 performed, which revealed that: “because of staff changes and the transitions of leadership, the
24 responsibility to track and report behested charitable contributions was not properly transferred to the
25 incoming staff.” Holden further maintains that once he became aware of the situation, he directed that the
26 behested payment reports be prepared and filed—which was accomplished in March 2018. Another set of

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28 ¹³ See Sections 82004.5, 82041.3, and 84224, as in effect after 2017; 82015, subdivision (b)(2)(B)(iii), as in effect before 2018; Jay advice letter ([A-10-088](#)), page 3; [Legal Division staff memo of 10/11/21](#) re: behested payments, pages 4 and 5.

1 behested payment reports were filed in December 2018. Holden voluntarily filed the late reports on
2 behalf of the Institute without any prompting by media or Enforcement Division inquiries.

3 **Comparable Case**

4 Historically, in cases with large numbers of violations involving failure to timely file behested
5 payment reports, Enforcement has used thresholds, on a case by case basis, to separate the most
6 egregious violations—in terms of reportable activity—from less egregious ones. The most recent
7 example is a mainline stipulation that the Commission approved in January 2023. [In the Matter of](#)
8 [William Dodd](#); FPPC Case No. 19/439 (approved Jan. 26, 2023), the Commission imposed a penalty in
9 the amount of \$7,500 for failure to timely file behested payment reports regarding 27 payments, totaling
10 \$481,900. Five counts were charged—with a penalty of \$1,500 per count.

11 Dodd involved violations that appeared to be the result of negligence by an official with no
12 history of prior, similar violations. No intent to conceal was found. Dodd voluntarily filed all required
13 behested payment reports, albeit late. He cooperated with Enforcement, and he entered into a tolling
14 agreement regarding the statute of limitations. Similar facts are present in the current case.

15 Also, both cases involve sophisticated respondents with ample reason to be familiar with the
16 Act’s requirements. (Prior to serving in the California Senate, Dodd served two years in the California
17 Assembly, and before this, he served 14 years on the Napa County Board of Supervisors. Holden has
18 been a member of the California State Assembly for 10+ years. Prior to this, he served almost 24 years as
19 a Pasadena City Councilmember and Mayor.) Additionally, both cases involve a pattern of filing
20 violations that occurred over multiple calendar years.

21 Despite these similarities, there are some differences between the cases that warrant more overall
22 counts and a higher total penalty in the current case.

23 **Aggravating Differences**

24 In Dodd, the filings for three of the payments were about three to three-and-a-half months late;
25 the rest were less than three months late. In the current case, however, the filings for about one-half of
26 the behested payments were from 120 to 276 days late. Additionally, the current case involves more than
27 three times the reportable activity of Dodd. This is discussed in more detail below in connection with the
28 number of recommended counts.

1 **Mitigating Differences**

2 Holden was the Chair of the Institute, a charitable organization raising funds for its scholarships
3 and other charitable purposes. Most of the events for which the payments were behested were long-
4 standing events that occur annually, beginning before Holden became the Chair, and had repeat donors
5 that participate in the fundraising events each year. (Similar facts were not noted in Dodd.) Further,
6 assuming responsibility as Chair for the Institute’s activities, Holden voluntarily disclosed the payments
7 without any contact from the Enforcement Division or the media after pro-actively conducting a review
8 of the Institute’s practices.

9 **Recommended Number of Counts and Penalty:**

10 **\$24,000 (16 counts at \$1,500 per count)**

11 Although one count may be charged for each late-filed behested payment report, this many counts
12 are not necessary to ensure that the penalty fits the wrongdoing.

13 Dodd involved late-filed reports regarding 27 behested payments (ranging in amounts from
14 \$5,000 to \$120,000)—totaling approximately \$481,900. One count was charged for each of the five
15 largest payments (ranging in amounts from \$20,000 to \$120,000). For settlement purposes, the remaining
16 22 payments (ranging in amounts from \$5,000 to \$14,400) were noted as aggravating information, but
17 they were not charged. The penalty of \$7,500—five counts at \$1,500 per count—equated to about 1.56%
18 of the combined total of all behested payments in that case.

19 The current case involves 94 payments (ranging in amounts from \$5,000 to \$100,000)—totaling
20 approximately \$1,576,500. At \$1,500 per count, 16 counts would result in a penalty of \$24,000, and this
21 is what Enforcement recommends. This penalty equates to approximately 1.52% of the combined total of
22 all behested payments in the current case, in keeping with Dodd and the differences between the cases
23 that are noted above.

24 **CONCLUSION**

25 Complainant, the Enforcement Division of the Fair Political Practices Commission, and
26 respondent Christopher Holden hereby agree as follows:

- 27 1. Respondent violated the Act as described in the foregoing pages, which are a true and
28 accurate summary of the facts in this matter.

1 2. This stipulation will be submitted for consideration by the Fair Political Practices
2 Commission at the regularly scheduled meeting that is noted in the case caption on page 1—or as soon
3 thereafter as the matter may be heard.

4 3. This stipulation resolves all factual and legal issues raised in this matter—for the purpose
5 of reaching a final disposition without the necessity of holding an administrative hearing to determine the
6 liability of respondent pursuant to Section 83116.

7 4. Respondent has consulted with his attorneys, Gary Winuk and Stephen Kaufman—of the
8 Kaufman Legal Group. Respondent understands and hereby knowingly and voluntarily waives, any and
9 all procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through
10 18361.9. This includes, but is not limited to the right to appear personally at any administrative hearing
11 held in this matter, to be represented by an attorney at respondent’s own expense, to confront and cross-
12 examine all witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an
13 impartial administrative law judge preside over the hearing as a hearing officer, and to have the matter
14 judicially reviewed.

15 5. Respondent agrees to the issuance of the decision and order set forth below. Also,
16 Respondent agrees to the Commission imposing against him an administrative penalty in the amount of
17 \$24,000. One or more payments totaling this amount—to be paid to the General Fund of the State of
18 California—is/are submitted with this stipulation as full payment of the administrative penalty described
19 above, and they will be held by the State of California until the Commission issues its decision and order
20 regarding this matter.

21 6. If the Commission refuses to approve this stipulation—then this stipulation shall become
22 null and void, and within fifteen business days after the Commission meeting at which the stipulation is
23 rejected, all payments tendered by respondent in connection with this stipulation shall be reimbursed to
24 respondent. If this stipulation is not approved by the Commission, and if a full evidentiary hearing before
25 the Commission becomes necessary, neither any member of the Commission, nor the Executive Director,
26 shall be disqualified because of prior consideration of this Stipulation.

27 ///

28 ///

1 7. The parties to this agreement may execute their respective signature pages separately. A
2 copy of any party’s executed signature page—including a hardcopy of a signature page transmitted via
3 fax or as a PDF email attachment—is as effective and binding as the original.
4

5
6 Dated: _____

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

7
8
9
10 Dated: _____

Christopher Holden, Respondent

11
12 The foregoing stipulation of the parties “In the Matter of Christopher Holden,” FPPC Case No.
13 2019-00429, is hereby accepted as the final decision and order of the Fair Political Practices
14 Commission, effective upon execution below by the Chair.
15

16 IT IS SO ORDERED.
17

18 Dated: _____

Richard C. Miadich, Chair
Fair Political Practices Commission