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BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

In the Matter of)	FPPC No.: 18/1268
)	
STEVE GRASHA FOR MISSION SPRINGS WATER DISTRICT 2018, STEVE GRASHA FOR DESERT WATER AGENCY 2022, and STEVE GRASHA,)	DEFAULT DECISION AND ORDER
Respondents.)	(Government Code Sections 11506 and 11520)

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

Pursuant to the California Administrative Procedure Act,¹ Steve Grasha (“Grasha”) and Steve Grasha for Mission Springs Water District 2018 (“the 2018 Committee”) and Steve Grasha for Desert Water Agency 2022 (“the 2022 Committee”) have been served with all of the documents necessary to conduct an administrative hearing regarding the above-captioned matter, including the following:

1. An Order Finding Probable Cause;
2. An Accusation;
3. A Notice of Defense (Two Copies per Respondent);

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

EXHIBIT 1

INTRODUCTION

Respondent Steve Grasha (“Grasha”) was elected to the Mission Springs Water District Board of Directors in the November 6, 2018 General Election. The term expired in December 2022.

Steve Grasha for Mission Springs Water District 2018 (the “2018 Committee”) was Grasha’s candidate-controlled committee.¹ Grasha served as the 2018 Committee’s treasurer.

Grasha also succeeded as a candidate in the November 8, 2022 General Election for Desert Water Agency, Division 1. Respondent Steve Grasha for Desert Water Agency 2022 (the “2022 Committee”) was Grasha’s candidate-controlled committee. Grasha served as the 2022 Committee’s treasurer. Grasha is currently still in office.

This matter arose out of a sworn complaint and an AdWatch referral filed with the Fair Political Practices Commission’s (the “Commission”) Enforcement Division.

The Political Reform Act (the “Act”)² requires committees and treasurers to: timely file a statement of organization with the SOS within 10 days of qualifying as a committee; establish a single campaign bank account; timely file certain campaign statements and reports; and to disclose the proper advertisement disclosures on any advertisements produced by the committee. The Committees and Grasha violated each of these provisions of the Act.

The Act also requires that every candidate for an elective office designated in a conflict of interest code file a statement disclosing the candidate’s investments, business positions, interests in real property, and income received during the preceding 12 months. Grasha violated this provision of the Act.

DEFAULT PROCEEDINGS UNDER THE ADMINISTRATIVE PROCEDURE ACT

When the Commission determines that there is probable cause for believing that the Act has been violated, it may hold a hearing to determine if a violation has occurred.³ Notice of the hearing and the hearing itself must be conducted in accordance with the Administrative Procedure

¹ Although the committee qualifications were met, Grasha did not properly establish a committee for the November 6, 2018 General Election, as will be discussed further in this Report.

² The Political Reform Act is contained in Government Code sections 81000 through 91014, and 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, and all regulatory references are to this source.

³ Section 83116.

Act (the “APA”).⁴ A hearing to determine whether the Act has been violated is initiated by the filing of an accusation, which shall be a concise written statement of the charges, specifying the statutes and rules which the respondent is alleged to have violated.⁵

Included among the rights afforded a respondent under the APA, is the right to file the Notice of Defense with the Commission within 15 days after service of the accusation, by which the respondent may (1) request a hearing; (2) object to the accusation on the ground it does not state acts or omissions upon which the agency may proceed; (3) object to the form of the accusation on the ground that it is so indefinite or certain that the respondent cannot identify the transaction or prepare a defense; (4) admit the accusation in whole or in part; (5) present new matter by way of a defense; or (6) object to the accusation on the ground that, under the circumstances, compliance with a Commission regulation would result in a material violation of another department’s regulation affecting substantive rights.⁶

The APA provides that a respondent’s failure to file a Notice of Defense within 15 days after service of an accusation constitutes a waiver of the respondent’s right to a hearing.⁷ Moreover, when a respondent fails to file a Notice of Defense, the Commission may take action based on the respondent’s express admissions or upon other evidence and affidavits that may be used as evidence without any notice to the respondent.⁸

PROCEDURAL REQUIREMENTS AND HISTORY

A. Initiation of the Administrative Action

The service of the probable cause hearing notice, as required by Section 83115.5, upon the person alleged to have violated the Act, starts the administrative action.⁹

A finding of probable cause may not be made by the Commission unless the person alleged to have violated the Act is 1) notified of the violation by service of process or registered mail with return receipt requested; 2) provided with a summary of the evidence; and 3) informed of his or her right to be present in person and represented by counsel at any proceeding of the Commission held for the purpose of considering whether probable cause exists for believing the person violated the Act.¹⁰ Additionally, the required notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office.¹¹

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

⁵ Section 11503.

⁶ Section 11506, subd. (a)(1)–(6).

⁷ Section 11506, subd. (c).

⁸ Section 11520, subd. (a).

⁹ Section 91000.5, subd. (a).

¹⁰ Section 83115.5.

¹¹ Section 83115.5.

No administrative action pursuant to Chapter 3 of the Act alleging a violation of any of the provisions of the Act may be commenced more than five years after the date on which the violation occurred.¹²

Documents supporting the procedural history are included in the attached Certification of Records (“Certification”) filed herewith at Exhibit 1, A-1 through A-8, A-33 and A-34 and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against Grasha, the 2018 Committee, and the 2022 Committee in this matter by serving them with a Report in Support of a Finding of Probable Cause (the “Report”) (Certification, Exhibit A-1) by certified mail.¹³ Grasha was served with the Report on August 7, 2023. The 2018 Committee and the 2022 Committee were served with the Report on August 7, 2023 (Certification, Exhibit A-2). As required by Section 83115.5, the packet served on Grasha, the 2018 Committee and the 2022 Committee contained a cover letter and a memorandum describing probable cause proceedings, advising that Grasha, the 2018 Committee, and the 2022 Committee had 21 days in which to request a probable cause conference and/or to file a written response to the Report (Certification, Exhibit A-3).

On August 8, 2023, Grasha, the 2018 Committee and the 2022 Committee requested a probable cause conference and records. On October 10, 2023 the Enforcement Division provided the requested records. After the records were submitted, Grasha, the 2018 Committee and the 2022 Committee no longer requested a probable cause conference.

The administrative action commenced on August 7, 2023, and the five-year statute of limitations was effectively tolled on this date.

B. Ex Parte Request for a Finding of Probable Cause

Because Grasha, the 2018 Committee, and the 2022 Committee failed to request a probable cause conference or submit a written response to the Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on June 13, 2024 (Certification, Exhibit A-4).

On June 19, 2024, the Hearing Officer, Legal Division, Karen Harrison, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on Grasha, the 2018 Committee, and the 2022 Committee. (Certification, Exhibit A-5).

¹² Section 91000.5.

¹³ Section 83115.5.

C. The Issuance and Service of the Accusation

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

Section 11503 states:

A hearing to determine whether a right, authority, license, or privilege should be revoked, suspended, limited, or conditioned shall be initiated by filing an accusation or District Statement of Reduction in Force. The accusation or District Statement of Reduction in Force shall be a written statement of charges that shall set forth in ordinary and concise language the acts or omissions with which the respondent is charged, to the end that the respondent will be able to prepare his or her defense. It shall specify the statutes and rules that the respondent is alleged to have violated, but shall not consist merely of charges phrased in the language of those statutes and rules. The accusation or District Statement of Reduction in Force shall be verified unless made by a public officer acting in his or her official capacity or by an employee of the agency before which the proceeding is to be held. The verification may be on information and belief.

Upon the filing of the accusation, the agency must 1) serve a copy thereof on the respondent as provided in Section 11505, subdivision (c); 2) include a post card or other form entitled Notice of Defense that, when signed by or on behalf of the respondent and returned to the agency, will acknowledge service of the accusation and constitute a notice of defense under Section 11506; 3) include (i) a statement that respondent may request a hearing by filing a notice of defense as provided in Section 11506 within 15 days after service upon the respondent of the accusation, and that failure to do so will constitute a waiver of the respondent's right to a hearing, and (ii) copies of Sections 11507.5, 11507.6, and 11507.7.¹⁵ The APA also sets forth the language required in the accompanying statement to the respondent.¹⁶

The Accusation and accompanying information may be sent to the respondent by any means selected by the agency, but no order adversely affecting the rights of the respondent may be made by the agency in any case unless the respondent has been served personally or by registered mail as set forth in the APA.¹⁷

On June 28, 2024, the Commission's Chief of Enforcement, James M. Lindsay, issued an Accusation against Grasha, the 2018 Committee, and the 2022 Committee. (Certification, Exhibit A-6). 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

¹⁴ Regulation 18361.4, subd. (g).

¹⁵ Section 11505, subd. (a).

¹⁶ Section 11505, subd. (b).

¹⁷ Section 11505, subd. (c).

of Government Code Sections 11506, 11507.5, 11507.6, and 11507.7, were served upon Grasha, the 2018 Committee and the 2022 Committee by personal service on July 16, 2024. (Certification, Exhibit A-7).

Along with the Accusation, the Enforcement Division served Grasha, the 2018 Committee, and the 2022 Committee with a “Statement to Respondent,” which notified them that they could request a hearing on the merits and warned that, unless a Notice of Defense was filed within 15 days of service of the Accusation, they would be deemed to have waived the right to a hearing. (Certification, Exhibit A-8). Grasha, the 2018 Committee, and the 2022 Committee did not file a Notice of Defense within the statutory time period, which ended on July 31, 2024.

As a result, on August 30, 2024, the Enforcement Division sent a letter to Grasha, the 2018 Committee, and the 2022 Committee advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for October 17, 2024 (Certification, Exhibit A-33).

On October 1, 2024, the Enforcement Division sent another letter to Grasha, the 2018 Committee, and the 2022 Committee advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for October 17, 2024 (Certification, Exhibit A-34). A copy of the Default Decision and Order and this accompanying Exhibit 1 with attachments was included with the letter.

SUMMARY OF THE LAW

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

An express purpose of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring all candidates, as well as the committees that support or oppose them, to disclose all contributions and expenditures made throughout a campaign.¹⁸ Along these lines, the Act includes a comprehensive campaign reporting system.¹⁹

A recipient committee shall file a statement of organization within 10 days after the committee has qualified as a committee and report the committee’s date of qualification. The Secretary of State (“SOS”) shall assign a number to each committee that files a statement of organization and shall notify the committee of the number.²⁰ If there is a change in any of the information contained in a statement of organization, an amendment shall be filed within 10 days

¹⁸ Section 81002, subd. (a).

¹⁹ Section 84200, *et seq.*

²⁰ Section 84101, subd. (a).

to reflect the change.²¹ The committee must file the original of the amendment with the SOS and a copy with the local filing officer.²²

A committee shall use only one name on its statement of organization.²³ Whenever identification of a committee is required by law, the identification shall include the full name of the committee as required in the statement of organization.²⁴

Upon the filing of the statement of intention pursuant to Section 85200, the individual shall establish one campaign contribution account at an office of a financial institution located in the state.²⁵ A candidate who raises contributions of \$2,000 or more in a calendar year shall set forth the name and address of the financial institution where the candidate has established a campaign contribution account and the account number on the committee statement of organization.²⁶ All contributions or loans made to the candidate, to a person on behalf of the candidate, or to the candidate's controlled committee shall be deposited in the account.²⁷ Any personal funds which will be utilized to promote the election of the candidate shall be deposited in the account prior to expenditure.²⁸ All campaign expenditures shall be made from the account.²⁹

At the core of the Act's campaign reporting system is the requirement that candidates and committees must file campaign statements and reports for certain periods and by certain deadlines. The Act requires candidates and their controlled committees to file campaign statements at specific times disclosing information regarding contributions received and expenditures made by the campaign committees.³⁰

Whenever the Act requires that a statement or report be filed prior to or not later than a specified date, and the deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for such a statement or report shall be extended to the next regular business day.³¹ This extension does not apply to 24-hour contribution reports when the due date falls on a Saturday, Sunday, or official state holiday immediately prior to an election.³²

All candidates appearing on the ballot to be voted on at the next election, their controlled committees, and committees primarily formed to support or oppose an elected officer, candidate,

²¹ Section 84103, subd. (a).

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

²³ Regulation 18402, subd. (a).

²⁴ Regulation 18402, subd. (c).

²⁵ Section 85201.

²⁶ Section 85201, subd. (b).

²⁷ Section 85201, subd. (c).

²⁸ Section 85201, subd. (d).

²⁹ Section 85201, subd. (e).

³⁰ Section 84200, *et seq.*

³¹ Section 81005, subd. (a) [effective 2019]; Regulation 18116, subd. (a) [2018].

³² Section 81005, subd. (b)(1) [effective 2019]; Regulation 18116, subd. (b)(1) [2018].

or a measure appearing on the ballot to be voted on at the next election shall file the applicable preelection statements specified in Section 84200.8.³³

Applicable preelection campaign statements shall be filed as follows: (1) for the period ending 45 days before the election, the statement shall be filed no later than 40 days before the election, and (2) for the period ending 17 days before the election the statement shall be filed no later than 12 days before the election.³⁴

A “late contribution” includes a contribution, including a loan, that totals in the aggregate \$1,000 or more and is made to or received by a candidate or a controlled committee during the 90-day period preceding the date of the election, or on the date of the election, at which the candidate is to be voted on.³⁵ Each committee that receives a late contribution shall report the late contribution within 24 hours of the time it is received.³⁶

Recipient committees shall file semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31 if they have made contributions or independent expenditures, including payments to a slate mailer organization, during the six-month period before the closing date of the statements.³⁷

An advertisement is any general or public communication that is authorized and paid for by a committee for the purpose of supporting or opposing one or more candidates for elective office or one or more ballot measures.³⁸ Any advertisement paid for by a committee must include the words “Paid for by”³⁹ or “Ad paid for by”⁴⁰ followed by the name of the committee as it appears on the most recent Statement of Organization filed with the SOS.

There are additional disclosure requirements, depending on the type of advertisement. An advertisement that is made via a form of electronic media that allows users to engage in discourse and post content, or any other type of social media, that is paid for by a candidate-controlled committee established for an elective office of the controlling candidate, and that does not support or oppose a ballot measure and is not paid for by an independent expenditure, must include “Ad paid for by” followed by the name of the committee in a contrasting color that is easily readable by the average viewer and in no less than 10-point font on the cover or header photo of the committee’s profile, landing page, or similar location.⁴¹

Additionally, an “online platform disclosed advertisement” is a paid electronic media advertisement on an online platform made via a form of electronic media that allows users to

³³ Section 84200.5, subd. (a).

³⁴ Section 84200.8, subd. (a)-(b).

³⁵ Section 82036, subd. (a).

³⁶ Section 84203, subd. (a).

³⁷ Section 84200 (a).

³⁸ Section 84501.

³⁹ Section 84502, subd. (a)(2) [2018].

⁴⁰ Section 84502, subd. (a)(2) [2022].

⁴¹ Section 84504.4, subd. (b) [2022].

engage in discourse and post content, or any other type of social media, for which the committee pays the online platform.⁴² A committee that disseminates an online platform disclosed advertisement must expressly notify the online platform that the advertisement is an advertisement as defined in Section 84501,⁴³ provide the online platform with the name of the committee as it appears on the most recent Statement of Organization,⁴⁴ provide the online platform with the name of the candidate to which the advertisement refers and the office to which the candidate is seeking election,⁴⁵ and provide the online platform with the name and identification number of the committee that paid for the advertisement.⁴⁶

“Mass mailing” means over 200 substantially similar pieces of mail.⁴⁷ No candidate, candidate-controlled committee established for an elective office for the controlling candidate, or political party committee shall send a mass mailing unless the name, street address, and city of the candidate or committee are shown on the outside of each piece of mail in the mass mailing and on at least one of the inserts included within each piece of mail of the mailing in no less than 6-point type that is in a color or print that contrasts with the background so as to be easily legible.⁴⁸ A post office box may be stated in lieu of a street address if the organization’s address is a matter of public record with the SOS.⁴⁹

No candidate, candidate-controlled committee established for an elective office for the controlling candidate, or political party committee shall send a mass electronic mailing unless the name of the candidate or committee is shown in the electronic mailing preceded by the words “Paid for by” in at least the same size font as a majority of the text in the electronic mailing.”⁵⁰

Another purpose of the Act is to ensure that the assets and income of public officials that may be materially affected by their official actions be disclosed, so that conflicts of interests may be avoided.⁵¹

Every candidate for an elective office that is designated in a conflict of interest code shall file a statement of economic interests (“Candidate SEI”) disclosing their investments, business positions, interests in real property, and income received during the immediately preceding 12 months, as enumerated in the disclosure requirements for that position.⁵² In 2018, the conflict of interest code for the Mission Springs Water District specified that members of the Board of Directors were public officials who managed public investments. The Act required public officials who manage public investments to disclose all reportable investments, interests in real property,

⁴² Section 84504.6, subd. (a)(2)(A)(i).

⁴³ Section 84504.6, subd. (b)(1).

⁴⁴ Section 84504.6, subd. (b)(2).

⁴⁵ Section 84504.6, subd. (b)(3).

⁴⁶ Section 84504.6, subd. (b)(4).

⁴⁷ Section 82041.5.

⁴⁸ Section 84305, subd. (a).

⁴⁹ *Id.*

⁵⁰ Section 84305, subd. (c)(1) and Regulation 18435.

⁵¹ Section 81002, subd. (c).

⁵² Section 87302.3.

and sources of income.⁵³ The Candidate SEI must be filed with the election official with whom the candidate’s declaration of candidacy or other nomination documents to appear on the ballot are required to be filed and must be filed no later than the final filing date for the declaration or nomination documents.⁵⁴

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-9 through A-32, and incorporated herein by reference.

Grasha and the 2018 Committee

According to records maintained by the Riverside County Registrar of Voters (“Riverside County ROV”), on August 9, 2018, Grasha filed a statement of intention to be a candidate for the Mission Springs Water District Board during the November 6, 2018 General Election (certification, Exhibit A-9). Grasha also filed a candidate campaign statement-short form (“Form 470”) on August 9, 2018, which states that a candidate does not anticipate receiving contributions or making expenditures totaling \$2,000 or more during the calendar year (Certification, Exhibit A-10).

According to invoices provided by Grasha, Grasha qualified as a committee on or around September 16, 2018, by making two expenditures of \$950 and \$1,395.36 for advertisements promoting Grasha’s candidacy (Certification, Exhibit A-11). The 2018 Committee and Grasha were required to file a statement of organization with the SOS within 10 days after the committee qualified but failed to do so. The 2018 Committee and Grasha filed a statement of organization on March 13, 2024, indicating the date of qualification as September 15, 2018 (Certification, Exhibit A-12).

Since Grasha was listed as a candidate on the November 6, 2018 election ballot, the 2018 Committee and Grasha were required to file the first preelection campaign statement with the Riverside County ROV by the September 27, 2018 deadline but failed to do so. The 2018 Committee and Grasha filed the first preelection statement on March 25, 2024 (Certification, Exhibit A-13). The 2018 Committee and Grasha were required to file the second preelection campaign statement with the Riverside County ROV by the October 25, 2018 deadline but failed to do so. The 2018 Committee and Grasha filed the second preelection statement on March 25, 2024 (Certification, Exhibit A-14).

The 90-day period preceding the November 6, 2018 General Election began on August 8, 2018. Invoices for advertisements purchased by Grasha reveal that, within this period, Grasha made several contributions to the 2018 Committee that required 24-hour contribution reports (Certification, Exhibit A-15).

⁵³ Section 87200.

⁵⁴ Section 87302.3.

STATEMENT/REPORT	REPORTING PERIOD	DUE DATE	DATE FILED	AMOUNT
24-Hour Contribution Report	9/11/2018	9/12/2018	Not Filed	\$1,395.36
24-Hour Contribution Report	9/23/2018	9/24/2018	Not Filed	\$1,500.00
24-Hour Contribution Report	10/17/2018	10/18/2018	Not Filed	\$3,154.60
24-Hour Contribution Report	10/26/2018	10/29/2018 ⁵⁵	Not Filed	\$3,154.60
24-Hour Contribution Report	10/30/2018	10/31/2018	Not Filed	\$3,154.60

The 2018 Committee and Grasha were required to file subsequent semi-annual campaign statements for the reporting periods of October 21, 2018 through December 31, 2018 by January 31, 2019, and failed to do so. The 2018 Committee and Grasha filed a termination semi-annual campaign statement covering October 21, 2018 through December 31, 2018 on March 25, 2024 (Certification, Exhibit A-16). The 2018 Committee and Grasha filed a termination statement of organization, indicating a termination date of December 31, 2018 on March 25, 2024 (Certification, Exhibit A-17).

Upon the filing of the statement of intention, Grasha was required to establish one campaign bank account. Since Grasha made contributions to the 2018 Committee of more than \$2,000, the 2018 Committee and Grasha were required to report the financial institution and account number on the committee’s statement of organization. Since the statement of organization was filed in 2024, the bank account information was obtained through committee records. Committee records indicated Grasha and the 2018 Committee failed to create a designated campaign bank account and the records indicated Grasha used a personal bank account, with personal expenses comingled with campaign expenses (Certification, Exhibit 18 and Certification, Exhibit 19).

Records of expenditures obtained by the Enforcement Division reveal that prior to the November 6, 2018 election, Grasha made expenditures for a variety of advertisements promoting Grasha’s candidacy. Most of these advertisements included advertisement disclosures; however, six mass emails, reaching 12,000 recipients, failed to include Grasha’s name or the name of the Committee preceded by the words “Paid for by” (Certification, Exhibit A-20 and A-21). The following is a summary of the mass emails:

⁵⁵ October 26, 2018 fell on a Friday, so the filing deadline was the following Monday.

DATE	MASS EMAILS	NUMBER SENT	DISCLOSURE
10/5/2018	Title: "Elect Steve Grasha – Mission Springs Water District"	2,000	Missing "Paid for by" and Candidate or Committee name
10/7/2018	Title: "New Leadership for Mission Springs Water District – Elect Steve Grasha, Director"	2,000	Missing "Paid for by" and Candidate or Committee name
10/12/2018	Title: "Absentee Ballots Have Arrived – Vote for Steve Grasha – Mission Springs Water District – Vote by Mail"	2,000	Missing "Paid for by" and Candidate or Committee name
10/15/2018	Title: "Steve Grasha for MSWD – We Know Him and We Trust Him with the Experience to Lead"	2,000	Missing "Paid for by" and Candidate or Committee name
10/26/2018	Title: "I Am Overwhelmed by the Support I Have Received Across the Mission Springs Water District and Desert Hot Springs"	2,000	Missing "Paid for by" and Candidate or Committee name
11/4/2018	Title: "Nude Photo of MSWF Director ... Sparks Massive Sex Offender Raid in Desert Hot Springs Area"	2,000	Missing "Paid for by" and Candidate or Committee name

Grasha Individually as a Candidate

Grasha was a candidate listed on the November 6, 2018 election ballot which required Grasha to file a Candidate SEI. According to records maintained by the Riverside County ROV Grasha filed a Candidate SEI on August 9, 2018 which covered the period of August 8, 2017 through August 8, 2018 (Certification, Exhibit A-22). Grasha was required to disclose investments, business positions, interests in real property, and income received during the preceding 12 months. Grasha reported no interests on the Candidate SEI (Certification, Exhibit A-22).

According to records maintained by the Mission Springs Water District, on December 13, 2018, Grasha assumed office with the Mission Springs Water District Board and timely filed the Assuming Office SEI, which covered the period of December 13, 2017 through December 13, 2018. On the Assuming Office SEI, Grasha reported income relating to ownership in True Fog, USA, with gross income estimated between \$10,001-\$100,000 (Certification, Exhibit A-23).

Since the two statement reporting periods overlap for the Candidate SEI and the Assuming Office SEI, the Assuming Office SEI revealed that Grasha had interests in True Fog, USA prior to August 8, 2018 and failed to report this interest on the Candidate SEI. Per the

Riverside County ROV, Grasha has not filed an amendment to the Candidate SEI to include the interest in True Fog, USA.

Grasha and the 2022 Committee

Grasha was a successful candidate in the November 8, 2022 General Election for Desert Water Agency, Division 1 (Certification, Exhibit 24). On September 6, 2022, the 2022 Committee and Grasha filed a statement of organization with the Riverside County ROV indicating the 2022 Committee had qualified on August 16, 2022 (Certification, Exhibit 25). However, according to SOS records, the 2022 Committee and Grasha failed to file the statement of organization with the SOS and, therefore, did not receive a committee identification number. As of the date of this Report, no statement of organization has been filed with the SOS.

According to 24-hour contribution reports filed with the Riverside County ROV, the Committee reported receiving four contributions as follows:

DATE RECEIVED	CONTRIBUTOR	AMOUNT	DUE DATE	DATE FILED
8/31/2022 ⁵⁶	Steve Grasha	\$10,000	9/1/2022	9/19/2022
10/7/2022	Steve Grasha	\$5,000	10/10/2022 ⁵⁷	10/19/2022
10/7/2022	Steve Grasha	\$5,000	10/10/2022 ⁵⁸	10/26/2022
11/3/2022	Steve Grasha	\$5,000	11/4/2022	11/8/2022

All four late contribution reports were not timely filed (Certification, Exhibit 26).

Since Grasha was listed as a candidate on the November 8, 2022 election ballot, the 2022 Committee and Grasha were required to file the first preelection campaign statement by September 29, 2022 and the second preelection campaign statement by October 27, 2022 but, according to filing officer records, they failed to do so. (Certification, Exhibit A-27 and Certification, Exhibit A-28). The 2022 Committee and Grasha were required to file the subsequent semi-annual campaign statement for the reporting period of October 23, 2022 through December 31, 2022 by January 31, 2023 but failed to do so (Certification, Exhibit A-29).

⁵⁶ The filed 24-hour contribution report disclosed the date the contribution was received as September 31, 2022. This appears to be a typographical error because September has only 30 calendar days, the date of the filing was reported by the Committee as September 1, 2022, and the report was date-stamped by the Riverside County ROV on September 19, 2022. It appears that the date received was either August 31, 2022 or September 1, 2022, with the corresponding deadlines of either September 1, 2022 or September 2, 2022.

⁵⁷ October 7, 2022 fell on a Friday, so the filing deadline was the following Monday.

⁵⁸ October 7, 2022 fell on a Friday, so the filing deadline was the following Monday.

The Facebook Ad Library shows that Grasha paid for six Facebook ads from September 30, 2022 to October 8, 2022 totaling \$400 - \$499. Each ad stated “Paid for by Steve Grasha” and was missing the name of the committee. An additional nine Facebook ads were purchased by Grasha from October 9, 2022 to October 27, 2022 totaling \$2,000 - \$2,500. Each ad stated, “Paid for by Steve Grasha,” and was also missing the name of the committee. (Certification, Exhibit A-30). The Committee created a Facebook and a Twitter account that also failed to include the required “Paid for by” and committee name disclosure (Certification, Exhibit A-31).

According to records obtained during the investigation, Grasha paid for 4,400 mailers on five separate occasions between October 6, 2022, and November 1, 2022, totaling \$15,257.71. All five mass mailings failed to include the words “Paid for by” (Certification, Exhibit A-32). The following is a summary of the mass mailings:

DATE	COST	NUMBER SENT	DISCLOSURE
10/6/2022	\$3,326.91	4,400	Missing “Paid for by”
10/17/2022	\$3,326.91	4,400	Missing “Paid for by”
10/21/2022	\$3,065.29	4,400	Missing “Paid for by”
10/28/2022	\$2,915.29	4,400	Missing “Paid for by”
11/1/2022	\$2,623.31	4,400	Missing “Paid for by”

Summary of Contact

The Enforcement Division contacted Grasha, the 2018 Committee and the 2022 Committee numerous times regarding this matter. Grasha was responsive on occasion; however, ultimately, he neither resolved his case nor requested a hearing.

Overall, the Enforcement Division contacted Grasha, the 2018 Committee and the 2022 Committee approximately thirty-six times throughout this case, as follows:

- November 2, 2018: phone call by the Enforcement Division Investigator to Grasha when requested if the male on the other end was Steve Grasha the caller hung up
- November 5, 2018: two phone calls to Grasha, one voicemail left for Grasha and one voicemail for True Fog, USA made by the Enforcement Division Investigator
- November 5, 2018: email to Grasha regarding filing campaign statements by the Enforcement Division Investigator
- November 5, 2018: two phone calls to Grasha, and two voicemails left for Grasha by the Enforcement Division Commission Counsel
- November 5, 2018: email to Grasha by the Enforcement Division Commission Counsel regarding filing campaign statements
- November 7, 2018: Grasha left a message for the Enforcement Division Commission Counsel

- November 7, 2018: email to Grasha by the Enforcement Division Investigator requesting records
- November 26, 2018: email to Grasha by the Enforcement Division Investigator requesting bank statements
- November 27, 2018: second email to Grasha by the Enforcement Division Investigator regarding a request for bank statements
- December 4, 2018: phone call with Grasha and the Enforcement Division Investigator. The investigator requested records, including bank account records, to which Grasha replied that he was not obligated to produce the records. Enforcement Division Investigator replied that Grasha was required to produce the records either voluntarily or by subpoena. Grasha then hung up
- December 4, 2018: after Grasha hung up on the Enforcement Division Investigator, the Enforcement Division Investigator emailed Grasha regarding producing campaign records and bank account statements
- December 11, 2018: email to Grasha by the Enforcement Division Investigator regarding emails sent during the 2018 campaign
- January 9, 2018: emails and replies between Grasha and the Enforcement Division Investigator regarding a request to accept a subpoena over email
- June 17, 2019: email to Grasha from the Enforcement Division Investigator regarding expenditures
- August 28, 2019: email and reply between Grasha and the Enforcement Division regarding reportable interests on statements of economic interest
- October 31, 2022: email to Grasha by the Enforcement Division Commission Counsel regarding Grasha's candidacy in 2022 General Election and filing preelection campaign statements
- August 7, 2023: Probable Cause Report Served on Grasha and all committees
- August 8, 2023: Grasha requests Probable Cause Conference
- August 14, 2023: email and replies with the Enforcement Division Commission Counsel regarding missing campaign filings
- August 31, 2023: email to Grasha from the Enforcement Division Commission Counsel
- September 1, 2023: email and replies with the Enforcement Division Commission Counsel regarding missing campaign filings
- September 7, 2023: email and replies with the Enforcement Division Commission Counsel regarding missing campaign filings
- September 13, 2023: email and replies with the Enforcement Division Commission Counsel regarding missing campaign filings
- October 10, 2023: Grasha received discovery packet from the Enforcement Division
- October 11, 2023: email and replies with the Enforcement Division Commission Counsel regarding scheduling a phone call
- October 16, 2023: phone call to Grasha from the Enforcement Division Commission Counsel
- January 9, 2024: email to Grasha from the Enforcement Division Commission Counsel
- January 22, 2024: email to Grasha from the Enforcement Division Commission Counsel

- February 16, 2024: email to Grasha from the Enforcement Division Commission Counsel regarding missing campaign filings
- March 12, 2024: email to Grasha from the Enforcement Division Commission Counsel regarding missing campaign filings
- April 3, 2024: email to Grasha from the Enforcement Division Commission Counsel
- April 11, 2024: email to Grasha from the Enforcement Division Commission Counsel
- May 15, 2024: email to Grasha from the Enforcement Division Commission Counsel
- May 17, 2024: phone call with Grasha and the Enforcement Division Commission Counsel
- June 24, 2024: email to Grasha from the Enforcement Division Commission Counsel
- July 16, 2024: Accusation Served on Grasha, the 2018 Committee and the 2022 Committee
- August 30, 2024: letter to Grasha, the 2018 Committee and the 2022 Committee informing them a Default Decision and Order would appear on the agenda for the September 19, 2024 Commission meeting as a notice item
- October 1, 2024: Notice of Intent to Enter Default Decision and Order to Grasha, the 2018 Committee and the 2022 Committee informing them that the Default Decision and Order would be presented at the October 17, 2024 meeting for Commission action

VIOLATIONS

The 2018 Committee and Grasha committed six violations of the Act, Grasha, individually, committed one violation of the Act, and Grasha and the 2022 Committee committed five violations of the Act as follows:

Grasha and the 2018 Committee

COUNT 1

Failure to Timely Amend a Statement of Organization- 2018

Grasha and the 2018 Committee had a duty to timely file an amended statement of organization to report the Committee's date of qualification of September 16, 2018 within 10 days of qualification. Grasha and the 2018 Committee failed to timely file an amended statement of organization to report the 2018 Committee's date of qualification. By failing to file an amended statement of organization, Grasha and the 2018 Committee violated Government Code Section 84101, subdivision (a).

COUNT 2

Failure to Timely File 24-Hour Contribution Reports - 2018

Prior to the November 6, 2018 General Election, Grasha and the 2018 Committee had a duty to timely file a 24-hour contribution report after receiving a late contribution of \$1,395 by September 12, 2018; \$1,500 by September 24, 2018; \$3,154.70 by October 18, 2018; \$3,154.60 by October 29, 2018; and \$3,154.60 by October 31, 2018. By failing to timely file five 24-hour contribution reports by the respective due dates, the 2018 Committee and Grasha violated Government Code Section 84203.

COUNT 3

Failure to Timely File Preelection and Semi-Annual Campaign Statements- 2018

Grasha and the 2018 Committee had a duty to timely file a preelection campaign statement for the reporting period of July 1, 2018 through September 22, 2018, due on September 27, 2018 and for the reporting period of September 23, 2018 through October 20, 2018 due on October 25, 2018. Grasha and the 2018 Committee also had a duty to timely file a semi-annual campaign statement covering the reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date. By failing to timely file the preelection campaign statements by September 27, 2018 and October 25, 2018 Grasha and the 2018 Committee violated Government Code Sections 84200.5 and 84200.8. By failing to timely file the semi-annual campaign statement by January 31, 2019, Grasha and the 2018 Committee violated Government Code Section 84200.

COUNT 4

Failure to Timely File Semi-Annual Campaign Statement- 2019

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

COUNT 5

Failure to Establish a Designated Campaign Bank Account

Grasha and the 2018 Committee had a duty to establish a designated campaign bank account to make all campaign expenditures from the designated campaign bank account. Grasha and the 2018 Committee failed to establish a designated campaign bank account and failed to make expenditures totaling approximately \$15,748.96 from a designated campaign bank account. By failing to make approximately \$15,748.96 in expenditures from a designated campaign bank account, Grasha and the 2018 Committee violated Government Code Section 85201.

COUNT 6

Failure to Include Proper Disclosure on Mass Emails

Grasha and the 2018 Committee had a duty to include the proper disclosure on mass emails produced by the Committee on October 5, 2018, October 7, 2018, October 12, 2018, October 15, 2018, October 26, 2018 and November 4, 2018. By failing to include the proper disclosure on mass emails Grasha and the 2018 Committee violated Government Code Section 84305, subdivision (c)(1).

Grasha Individually as a Candidate

COUNT 7

Failure to Timely Disclose Interests on the Candidate Statement of Economic Interest

Grasha, as a candidate on the ballot in the November 6, 2018 General Election, had a duty to file a Candidate Statement of Economic Interest and disclose all reportable interests. Grasha failed to report income from True Fog, USA on the Candidate Statement of Economic Interest. By failing to report income on the Candidate Statement of Economic Interest, Grasha violated Government Code Section 87302.3.

Grasha and the 2022 Committee

COUNT 8

Failure to Timely Amend a Statement of Organization- 2022

Grasha and the 2022 Committee had a duty to timely file an amended statement of organization to report the Committee's date of qualification of August 16, 2022 within 10 days of qualification. Grasha and the 2022 Committee failed to timely file an amended statement of organization to report the 2022 Committee's date of qualification. By failing to file an amended statement of organization, Grasha and the 2022 Committee violated Government Code Section 84101, subdivision (a).

COUNT 9

Failure to Timely File 24-Hour Contribution Reports- 2022

Prior to the November 8, 2022 General Election, Grasha and the 2022 Committee had a duty to timely file 24-hour contribution reports after receiving late contributions of \$10,000 by September 1, 2022; \$5,000 by October 10, 2022; \$5,000 by October 10, 2022; \$5,000 by November 4, 2022. Grasha and the 2022 Committee failed to timely file a 24-hour contribution report after receiving late contributions of \$10,00 by September 1, 2022; \$5,000 by October 10, 2022; \$5,000 by October 10, 2022; \$5,000 by November 4, 2022. By failing to timely file four 24-hour contribution reports by the respective due dates, the Grasha and the 2022 Committee violated Government Code Section 84204.

COUNT 10

Failure to Timely File Preelection and Semi-Annual Campaign Statements- 2022

Grasha and the 2022 Committee had a duty to timely file a preelection campaign statement for the reporting period of July 1, 2022 through September 24, 20122, by September 29, 2022 and for the reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due date. Grasha and the 2022 Committee also had a duty to timely file a semi-annual campaign statement covering the reporting period of October 23, 2022 through December 31, 2022 by the

January 31, 2023 due date. By failing to timely file the preelection campaign statements by September 29, 2022 and October 27, 2022 Grasha and the 2022 Committee violated Government Code Sections 84200.5 and 84200.8. By failing to timely file the semi-annual campaign statement by January 31, 2019, Grasha and the 2022 Committee violated Government Code Section 84200.

COUNT 11

Failure to Include Proper Advertisement Disclosure on Social Media Advertisements

Grasha and the 2022 Committee had a duty to include the proper disclosure on its Facebook and Twitter landing pages. Grasha and the 2022 Committee failed to include the proper disclosure on its Facebook and Twitter landing pages. By failing to include the proper disclosure on its Facebook and Twitter landing pages, Grasha and the 2022 Committee violated Government Code Section 84504.4, subdivision (b).

Grasha and the 2022 Committee also had a duty to provide the online platform with the required information for fifteen online platform disclosed advertisements between September 30, 2022 and October 27 2022, six between September 30, 2022 and October 8, 2022 and an additional nine between October 9, 2022 and October 27, 2022. Grasha and the 2022 Committee failed to provide the online platform with the required information for fifteen online platform disclosed advertisements between September 30, 2022, and October 27, 2022, which resulted in incorrect advertisement disclosures on fifteen online advertisements. By failing to provide the online platform with the required information for fifteen online platform disclosed advertisements, Grasha and the 2022 Committee violated Government Code Section 84504.6, subdivision (b).

COUNT 12

Failure to Include Proper Disclosure on Mass Mailing

Grasha and the 2022 Committee had a duty to include the proper disclosure on mass mailing advertisements distributed on October 6, 2022, October 17, 2022, October 21, 2022, October 28, 2022 and November 1, 2022. Grasha and the 2022 Committee failed to include the proper disclosure on mass mailing advertisements distributed on October 6, 2022, October 17, 2022, October 21, 2022, October 28, 2022 and November 1, 2022. By failing to include the proper disclosure on mass mailing advertisements distributed on October 6, 2022, October 17, 2022, October 21, 2022, October 28, 2022 and November 1, 2022, Grasha and the 2022 Committee violated Government Code Section 84305.

CONCLUSION

This matter consists of 12 counts of violating the Act, which carry a maximum total administrative penalty of \$60,000.⁵⁹

⁵⁹ Section 83116, subd. (c).

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.⁶⁰

With respect to the first factor, the extent and the gravity of the public harm is significant. In this matter, Grasha and the 2018 Committee failed to timely file a statement of organization with the SOS within 10 days of qualifying as a committee; failed to timely file two preelection campaign statements, two semi-annual campaign statements and five 24-hour contribution reports; failed to establish a single campaign bank account and failed to disclose the proper advertisement disclosures on mass emails. Grasha as a candidate failed to timely report income on a candidate SEI. Grasha and the 2022 Committee failed to timely file a statement of organization with the SOS within 10 days of qualifying as a committee; failed to timely file two preelection campaign statements, one semi-annual campaign statement and four 24-hour contribution reports; and failed to disclose the proper advertisement disclosures on any social media, and mass mailings.

A central purpose of the Act is to ensure receipts and expenditures in election campaigns are fully and truthfully disclosed. The violations here include the failure to timely file campaign statements and reports. The 2018 and 2022 Committee's failure to timely file campaign statements, particularly the preelection campaign statements and multiple 24-hour reports deprived the public of important time-sensitive information regarding both committees' activity prior to the election. Prior to the November 6, 2018 General Election, Grasha filed one campaign statement: a candidate campaign short form, stating Grasha did not anticipate receiving contributions or expenditures totaling \$2,000 or more. The investigation determined Grasha made well more than \$2,000 in expenditures and failed to timely file any other campaign statements or reports before the election. The missing campaign statements were not filed until 2024, more than five years after initial and repeated Enforcement contact. This public harm is also aggravated because Grasha was a successful candidate in the 2018 election. In 2018, the failure to comply with campaign filing obligations resulted in a complete lack of accurate information for the voting public regarding Grasha and the 2018 Committee's campaign activity before the November 6 2018 General Election. Similarly, in 2022, both preelection campaign statements were not filed prior to the 2022 General Election, and the voting public was again deprived of time-sensitive information regarding the 2022 Committee's activity prior to the election.

⁶⁰ Regulation 18361.5, subd. (e).

The failure to utilize a designated campaign bank account causes public harm in that it erodes the trust placed in candidates to utilize campaign funds for proper purposes. The provisions also ensure all transactions are properly reported and that campaign statements are easily substantiated with records and source documents. Here, Grasha and the 2018 Committee failed to open a designated bank account for the 2018 General Election despite having run for office many times previously (see below). The failure to establish, maintain or utilize a campaign bank account negatively impacted the ability to fully investigate and potentially discover additional violations of the 2018 Committee.

The failure to include the proper advertisement disclosures on advertisements deprives the public of important, time-sensitive information regarding the identity of who paid for and disseminated advertisements, which could have an affect on how votes are cast. Here, Grasha disseminated thousands of various types of advertisements in both the 2018 election and the 2022 election. The mass emails, social media accounts and advertisements posted to those accounts, and mass mailings failed to include the proper disclosure. However, the public harm is mitigated here because some of the advertisements charged here, the social media ads, included some form of disclosure, although incorrect.

Regarding the second factor, Grasha has significant experience with the Act's requirements. Prior to running for office in 2018, Grasha opened committees in 1982, 1985, 1990, 1991, 1999, 2002, 2012, 2013, 2014, 2016, and 2017. Grasha also intends to run for office again in 2026.

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

Count 1:

- *In the Matter of Eric Payne and Eric Payne for SCCCD 2016 Trustee Area 2*; FPPC No. 16/19917. (The Commission approved a default decision on June 13, 2019.) The respondents, among other violations, failed to timely amend a statement of organization. Payne was experienced with the Act. The Commission imposed a penalty of \$2,000.

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

Count 2:

- *In the Matter of Californians in Support of Mike Antonovich State Senate 2016 and Shelley Levine*; FPPC Nos. 17/1397 and 18/821. (The Commission approved a default decision on March 24, 2022.) The respondents, among other violations, failed to timely file two 24-hour contribution reports for \$3,000 and \$10,000 before the election. Both reports were filed after the election, and the contributions were not timely disclosed on another campaign statement before the election. The Commission imposed a penalty of \$4,500.

Here, Grasha failed to timely file five 24-hour contribution reports ranging from \$1,500 to \$3,154. Similar to *Antonovich*, the reports were not filed before the election, and the contributions were not timely filed on another campaign statement before the election. Therefore, a similar penalty of \$4,500 is recommended.

Count 3:

- *In the Matter of Joe Aguirre and Friends of Joe Aguirre for Delano City Council 2014*; FPPC No. 17/193. (The Commission approved a default decision on March 24, 2022.) The respondents, among other violations, failed to timely file two preelection campaign statements prior to the November 8, 2016 General Election. Aguirre had prior experience with the Act and Aguirre failed to provide any disclosure prior to the 2016 election. Eventually Aguirre filed the outstanding campaign statements while Aguirre was in office, after receiving contact from the Enforcement Division, and after the relevant election. The Commission imposed a penalty of \$5,000 per count for two counts.

Here, during the 2018 election cycle, Grasha failed to timely file two preelection campaign statements and one semi-annual campaign statement. Similar to *Aguirre*, the statements were eventually filed well after the election in response to Enforcement Division contact and while Grasha was in office. Additionally, similar to *Aguirre*, prior to the 2018 election, Grasha provided no disclosure, as the only statement filed prior to the 2018 election was a short-form campaign statement indicating Grasha did not intend to raise or spend more than \$2,000. Therefore, a similar penalty of \$5,000 is recommended.

Count 4:

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

Here, Grasha failed to timely file one semi-annual campaign statement disclosing no contributions and \$6,997 in expenditures. The statement was filed over 5 years late while Grasha was in office. In both cases, the amount the respondents failed to disclose was similar, the statements were unrelated to an upcoming election, and the statements in both cases were filed well after they were due. Therefore, a similar penalty of \$3,500 is recommended.

Count 5:

- *In the Matter of H.S Fangary for City Council 2017, Hany S. Fangary and Dina Fangary*; FPPC Nos. 18/005 and 22/033 (The Commission approved a stipulated settlement on November 17, 2022.) The respondents, among other violations, failed to deposit all contributions into and make all expenditures from a designated campaign bank account over three reporting periods. Two of the reporting periods had activity outside the campaign bank account that exceeded 60% of the total activity. Additionally, contributions were comingled with personal funds that were utilized to make expenditures. The Commission imposed a penalty of \$3,000.

Here, Grasha failed to create a designated campaign bank account, despite having been required to do so for Grasha's previous committees. Grasha failed to utilize a campaign bank account for 100% of the contributions and 100% of expenditures during the 2018 election cycle, a higher percentage than in *Fangary*. Grasha used a personal account to make all expenditures, and personal funds to make contributions to the 2018 Committee without first depositing them into a campaign bank account. Therefore, a higher penalty of \$5,000 is recommended.

Count 6:

- *In the Matter of Megan Dahle for Assembly 2020 and Megan Dahle*; FPPC No. 20/323. (The Commission approved a stipulated settlement on July 24, 2020.) The respondents failed to include the name of the Committee on a mass mailing. The mass mailing had the disclosure "Paid for by Dahle for Senate 2019" instead of "Paid for by Megan Dahle for Assembly 2020." The committee Dahle for Senate 2019 was controlled by Megan Dahle's husband, causing confusion regarding the sender of the mailer. The Commission imposed a penalty of \$2,500.

Here, Grasha disseminated six mass emails to 12,000 recipients and failed to include the "Paid for by" language and the name of the candidate or committee name. None of the emails contained any disclosure, creating confusion regarding who disseminated the emails, similar to *Dahle*. Therefore, a similar penalty of \$2,500 is recommended.

Count 7:

- *In the Matter of Karson Klauer*; FPPC 17/1313. (The Commission approved a stipulated settlement on January 21, 2021.) Klauer was elected as a city council member in the November 4, 2014 General Election. As a council member, Klauer failed to timely report income on an assuming office and two annual statements of economic interest. The Commission imposed a penalty of \$2,000.

Here, Grasha also failed to timely report income on a statement of economic interest. Although, unlike in *Klauer*, the statement was a candidate statement of economic interest,

and the failure to report only occurred on one statement here, as opposed to three statements in *Klauer*. Finally, here, unlike in *Klauer*, Grasha had previously reported the interest on another statement of economic interest. Therefore, a similar penalty of \$2,000 is recommended.

Count 8:

- *In the Matter of Eric Payne and Eric Payne for SCCCD 2016 Trustee Area 2*; FPPC No. 16/19917. (The Commission approved a default decision on June 13, 2019.) The respondents, among other violations, failed to timely amend a statement of organization. Payne was experienced with the Act. The Commission imposed a penalty of \$2,000.

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

Count 9:

- *In the Matter of Californians in Support of Mike Antonovich State Senate 2016 and Shelley Levine*; FPPC Nos. 17/1397 and 18/821. (The Commission approved a default decision on March 24, 2022.) The respondents, among other violations, failed to timely file two 24-hour contribution reports for \$3,000 and \$10,000 before the election. Both reports were filed after the election, and the contributions were not timely disclosed on another campaign statement before the election. The Commission imposed a penalty of \$4,500.

Here, Grasha failed to timely file four 24-hour contribution reports ranging from \$5,000 to \$10,000. Unlike in *Antonovich*, three reports were filed before the election and the fourth on election day. Similar to *Antonovich*, the contributions were not timely filed on another campaign statement before the election. Therefore, a lesser penalty of \$4,000 is recommended.

Count 10:

- *In the Matter of Joe Aguirre and Friends of Joe Aguirre for Delano City Council 2014*; FPPC No. 17/193. (The Commission approved a default decision on March 24, 2022.) The respondents, among other violations, failed to timely file two preelection campaign statements prior to the November 8, 2016 General Election. Aguirre had prior experience with the Act and Aguirre failed to provide any disclosure prior to the 2016 election. Eventually, Aguirre filed the outstanding campaign statements after receiving contact from the Enforcement Division and while Aguirre was in office. The Commission imposed a penalty of \$5,000 per count for two counts.

Here, during the 2022 election cycle, Grasha failed to timely file two preelection campaign statements and one semi-annual campaign statement. Similar to *Aguirre*, the statements were eventually filed well after the election in response to Enforcement Division contact

and while Grasha was in office. Additionally, similar to *Aguirre*, prior to the 2022 election, Grasha provided limited disclosure, as the only statements filed prior to the 2022 election were four late 24-hour reports. Therefore, a similar penalty of \$5,000 is recommended.

Count 11:

- *In the Matter of Megan Dahle for Assembly 2020 and Megan Dahle*; FPPC No. 20/323. (The Commission approved a stipulated settlement on July 24, 2020.) The respondents failed to include the name of the Committee on a mass mailing. The mass mailing had the disclosure “Paid for by Dahle for Senate 2019” instead of “Paid for by Megan Dahle for Assembly 2020.” The committee Dahle for Senate 2019 was controlled by Megan Dahle’s husband, causing confusion regarding the sender of the mailer. The Commission imposed a penalty of \$2,500.

Here, Grasha made social media advertisements without the proper disclosure. The advertisements included the words “Paid for by Stever Grasha” instead of the “paid for by” language followed by the committee’s name. There was no confusion regarding who paid for the advertisements, unlike in *Dahle*. Therefore, a lesser penalty of \$2,000 is recommended.

Count 12:

- *In the Matter of Megan Dahle for Assembly 2020 and Megan Dahle*; FPPC No. 20/323. (The Commission approved a stipulated decision on July 24, 2020.) The respondents failed to include the name of the Committee on a mass mailing. The mass mailing had the disclosure “Paid for by Dahle for Senate 2019” instead of “Paid for by Megan Dahle for Assembly 2020.” The committee Dahle for Senate 2019 was controlled by Megan Dahle’s husband, causing confusion regarding the sender of the mailer. The Commission imposed a penalty of \$2,500.

Here, Grasha disseminated mass mailings to 4,500 recipients on five occasions and failed to include the proper advertisement disclosure. The mailers fail to include “Paid for by” language but do contain the committee name. Therefore, unlike in *Dahle*, there is no confusion regarding who disseminated the emails. Therefore, a lower penalty of \$2,000 is recommended.

Regarding the fourth factor and fifth factors, the Enforcement Division did not find substantial evidence of concealment; however, the filing and bank account violations do tend to show deliberation. Grasha not only had prior experience with the Act and its obligations but also continued his pattern with the 2022 Committee. Grasha indicated in his Statement of Organizations that he would not meet monetary thresholds only to meet them quickly and fail to amend. He was also exceedingly slow to act after Enforcement contact. In fact, Grasha was actively uncooperative at points during the investigation, refusing to return phone calls to Enforcement Staff until after the 2018 General Election, hanging up on the Enforcement Division Investigator, and refusing to

voluntarily comply with a request for records regarding Grasha’s bank account, resulting in the issuance of a subpoena.

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

Regarding the seventh factor, these violations appear to be a part of a pattern, as Grasha has prior Enforcement Division history for failing to timely file campaign statements. Grasha has two previous cases that resulted in administrative termination.⁶¹

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

PROPOSED PENALTY

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

Counts	Violations: Grasha and 2018 Committee	Proposed Penalty per Count
1	Failure to Timely Amend a Statement of Organization	\$2,000
2	Failure to Timely File 24-Hour Contribution Reports	\$4,500
3	Failure to Timely File Preelection and Semi-annual Campaign Statements	\$5,000
4	Failure to Timely File Semi-annual Campaign Statement	\$3,500
5	Failure to Establish a Designated Campaign Bank Account	\$5,000
6	Failure to Include Proper Disclosure on Mass Emails	\$2,500
	Total:	\$22,500

Counts	Violations: Grasha Individually as a Candidate	Proposed Penalty per Count
7	Failure to Timely Disclose Interests on the Candidate Statement of Economic Interest	\$2,000
	Total:	\$2,000

Counts	Violations: Payne and the Committee	Proposed Penalty per Count
8	Failure to Timely Amend a Statement of Organization	\$2,000
9	Failure to Timely File 24-Hour Contribution Reports	\$4,000

⁶¹ FPPC Case Nos 26/525 and 18/968.

10	Failure to Timely File Preelection and Semi-annual Campaign Statements	\$5,000
11	Failure to Include Proper Advertisement Disclosure on Social Media Advertisements	\$2,000
12	Failure to Include Proper Disclosure on Mass Mailings	\$2,500
	Total:	\$15,500
Proposed Total Penalty:		\$40,000



**DECLARATION OF CUSTODIAN OF RECORDS
CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
Enforcement Division**

CERTIFICATION OF RECORDS

The undersigned declares and certifies as follows:

1. I am employed as an Associate Governmental Program Analyst by the California Fair Political Practices Commission (Commission). My business address is: California Fair Political Practices Commission, 1102 Q St, Ste 3050, Sacramento, CA 95811.
2. I am a duly authorized custodian of the records maintained by the Commission in the Enforcement Division. As such, I am authorized to certify copies of those records as being true and correct copies of the original business records which are in the custody of the Commission.
3. I have reviewed documents maintained in *FPPC Case No. 18/1268; Steve Grasha for Mission Springs Water District 2018, Steve Grasha for Desert Water Agency 2022, and Steve Grasha* 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 August 1, 2023.

EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated August 1, 2023

EXHIBIT A-3: Probable Cause Cover Letter, Probable Cause Fact Sheet, Probable Cause Statutes and Regulations, Dated August 1, 2023.

EXHIBIT A-4: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated June 13, 2024.

EXHIBIT A-5: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated June 19, 2024.

- EXHIBIT A-6: Accusation, dated June 28, 2024.
- EXHIBIT A-7 Proof of Service on July 16, 2024, for Accusation and accompanying documents from process server, dated July 16, 2024
- EXHIBIT A-8: Statement to Respondent, which accompanied the Accusation.
- EXHIBIT A-9: Statement of Intention, dated August 9, 2018.
- EXHIBIT A-10: Candidate Campaign Statement Short Form, dated August 9, 2018.
- EXHIBIT A-11: Invoices and checks for advertisements supporting the 2018 Committee's date of qualification.
- EXHIBIT A-12: Initial Statement of Organization for 2018 Committee, dated March 13, 2024.
- EXHIBIT A-13 Campaign statement for the reporting period of January 1, 2018 though September 22, 2018, filed on March 25, 2024.
- EXHIBIT A-14: Campaign statement for the reporting period of September 23, 2018 through October 20, 2018, filed on March 25, 2024.
- EXHIBIT A-15: Invoices and checks from Grasha to vendors over \$1,000 during the 90 day period.
- EXHIBIT A-16: Campaign statement for the reporting period of October 21, 2018 through December 31, 2018, filed March 25, 2024.
- EXHIBIT A-17: Termination Statement of Organization, filed March 25, 2024.
- EXHIBIT A-18: Declaration of Special Investigator Ann Flaherty, dated October 1, 2024
- EXHIBIT A-19: Steve Grasha Chase Bank Statements and Checks
- EXHIBIT A-20: Mass Emails disseminated by Steve Grasha and the 2018 Committee
- EXHIBIT A-21: Emails between Steve Grasha and Enforcement Division Investigator regarding how many mass emails Grasha disseminated
- EXHIBIT A-22: Steve Grasha's Candidate Statement of Economic Interest, filed on January 2, 20219.
- EXHIBIT A-23: Steve Grasha Assuming Office Statement of Economic Interest, filed on August 9, 2018.

- EXHIBIT A-24: Desert Water Agency website page for Steve Grasha.
- EXHIBIT A-25: Initial Statement of Organization for 2022 Committee, filed on September 6, 2022.
- EXHIBIT A-26: The 2022 Committee's 24-Hour Reports filed on: September 19, 2022, October 19, 2022, October 26, 2022, and November 8, 2022.
- EXHIBIT A-27: Campaign statement for the reporting period of January 1, 2022, through September 24, 2022, filed on September 14, 2023.
- EXHIBIT A-28: Campaign statement for the reporting period of September 25, 2022 through October 22, 2022, filed on September 14, 2023.
- EXHIBIT A-29: Campaign statement for the reporting period of October 23, 2022 through December 31, 2022, filed on September 14, 2023.
- EXHIBIT A-30: Facebook Advertisements purchased by Steve Grasha between October 9, 2022 and October 27, 2022.
- EXHIBIT A-31: Screenshots of Facebook and Twitter accounts for the 2022 Committee
- EXHIBIT A-32: Mass Mailings, invoices, and checks
- EXHIBIT A-33: Notice of Default Decision and Order, dated August 30, 2024.
- EXHIBIT A-34: Notice of Intent to Enter Default Decision and Order, dated October 1, 2024.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 1, 2024, at Sacramento, California.



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

Exhibit A-1

1 CHRISTOPHER B. BURTON
Acting Chief of Enforcement
2 ANGELA J. BRERETON
Assistant Chief of Enforcement
3 **FAIR POLITICAL PRACTICES COMMISSION**
4 1102 Q Street, Suite 3050
Sacramento, CA 95811
5 Telephone: (916) 322-5771
Email: abrereton@fppc.ca.gov

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

8
9 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

10 **STATE OF CALIFORNIA**

11 In the Matter of:

12 STEVE GRASHA FOR MISSION
13 SPRINGS WATER DISTRICT 2018,
14 STEVE GRASHA FOR DESERT
15 WATER AGENCY 2022, and STEVE
GRASHA

16 Respondent.

FPPC Case No. 2018-01268

**REPORT IN SUPPORT OF A FINDING
OF PROBABLE CAUSE**

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

17 **INTRODUCTION**

18 Respondent Steve Grasha (“Grasha”) was elected to the Mission Springs Water District Board
19 of Directors in the November 6, 2018 General Election. The term expired in December 2022.

20 Respondent Steve Grasha for Mission Springs Water District 2018 (the “2018 Committee”) was
21 Grasha’s candidate-controlled committee.¹

22 Grasha also succeeded as a candidate in the November 8, 2022 General Election for Desert
23 Water Agency, Division 1. Respondent Steve Grasha for Desert Water Agency 2022 (the “2022
24 Committee”) was Grasha’s candidate-controlled committee. Grasha served as the 2022 Committee’s
25 treasurer.

26
27
28 ¹ Although the committee qualifications were met, Grasha did not properly establish a committee for the November 6, 2018 General Election, as will be discussed further in this Report.

1 The Political Reform Act (the “Act”)² requires committees and treasurers to: timely file a
2 statement of organization with the Secretary of State within 10 days of qualifying as a committee;
3 establish a single campaign bank account; timely file certain campaign statements and reports; and to
4 disclose the proper advertisement disclosures on any mass mailings and advertisements produced by
5 the committee. The Committees and Grasha violated each of these provisions of the Act.

6 The Act also requires that every candidate for an elective office that is designated in a conflict
7 of interest code shall file a statement disclosing the candidate’s investments, business positions,
8 interests in real property, and income received during the preceding 12 months. Grasha violated this
9 provision of the Act.

10 SUMMARY OF THE LAW

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

15 Jurisdiction

16 The Fair Political Practices Commission (the “Commission”) has primary responsibility for the
17 impartial, effective administration and implementation of the Act.³ This includes enforcement through
18 administrative prosecution.⁴ However, before the Commission’s Enforcement Division may commence
19 administrative prosecution by filing/serving an Accusation, a hearing officer (either the General
20 Counsel of the Commission or another attorney in the Commission’s Legal Division) must determine
21 whether there is probable cause that supports a reasonable belief or strong suspicion that one or more
22 violations of the Act occurred.⁵ Any finding of probable cause is required by law to be announced
23 publicly, which includes the posting of a summary of the allegations on the Commission’s website.⁶
24

25
26 ² The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory
27 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, and all regulatory references are to this source.

³ Section 83111.

⁴ Section 83116.

⁵ Sections 83115.5 and 83116; Regulations 18361, subd. (b), and 18361.4.

⁶ Regulation 18361.4, subd. (g).

1 After a finding of probable cause, the Commission may then hold a hearing to determine what
2 violations have occurred—and levy an administrative penalty of up to \$5,000 for each violation.⁷

3 Standard for Finding Probable Cause

4 For the hearing officer to make a finding of probable cause, it is only necessary that he or she be
5 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act
6 has been violated.⁸ Probable cause may only be found if the Respondents were notified of the violations
7 at least 21 days prior to the hearing officer’s consideration of the alleged violations.⁹

8 Contents of the Probable Cause Report

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

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

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

17 A central purpose of the Act is to promote transparency by ensuring receipts and expenditures in
18 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper
19 practices are inhibited.¹³ Additionally, a central purpose of the Act is to increase transparency and
20 decrease conflicts of interest in the actions of public officials by requiring disclosure of their economic
21 interests.¹⁴ Another is to provide adequate enforcement mechanisms so that the Act will be “vigorously
22 enforced.”¹⁵

23
24
25 ⁷ Section 83116; Regulation 18361.4, subd. (g).

26 ⁸ Regulation 18361.4, subd. (a).

27 ⁹ Section 83115.5.

28 ¹⁰ Regulation 18361.4, subd. (b).

¹¹ Section 81001, subdivision (h).

¹² Section 81003.

¹³ Section 81002, subdivision (a).

¹⁴ Section 81002, subdivision (c).

¹⁵ Section 81002, subdivision (f).

1 Committee

2 Under the Act, “committee” means any person or combination of persons who directly or
3 indirectly receives contributions totaling \$2,000 or more in a calendar year.¹⁶ This type of committee is
4 known as a recipient committee.

5 Duty to File Statement of Organization

6 A recipient committee shall file a statement of organization within 10 days after the committee
7 has qualified as a committee and report the committee’s date of qualification. The Secretary of State
8 shall assign a number to each committee that files a statement of organization and shall notify the
9 committee of the number.¹⁷ If there is a change in any of the information contained in a statement of
10 organization, an amendment shall be filed within 10 days to reflect the change.¹⁸ The committee must
11 file the original of the amendment with the Secretary of State (“SOS”) and a copy with the local filing
12 officer.¹⁹

13 A committee shall use only one name on its statement of organization.²⁰ Whenever
14 identification of a committee is required by law, the identification shall include the full name of the
15 committee as required in the statement of organization.²¹

16 Mandatory Use of Single, Designated Campaign Bank Account

17 Upon the filing of the statement of intention pursuant to Section 85200, the individual shall
18 establish one campaign contribution account at an office of a financial institution located in the state.²²

19 A candidate who raises contributions of \$2,000 or more in a calendar year shall set forth the
20 name and address of the financial institution where the candidate has established a campaign
21 contribution account and the account number on the committee statement of organization.²³

22 All contributions or loans made to the candidate, to a person on behalf of the candidate, or to the
23 candidate’s controlled committee shall be deposited in the account.²⁴

24 _____
25 ¹⁶ Section 82013, subdivision (a).

26 ¹⁷ Section 84101, subdivision (a).

27 ¹⁸ Section 84103, subdivision (a).

28 ¹⁹ Sections 84103, subdivision (a); and 84215.

²⁰ Regulation 18402, subdivision (a).

²¹ Regulation 18402, subdivision (c).

²² Section 85201.

²³ Section 85201, subdivision (b).

²⁴ Section 85201, subdivision (c).

1 Any personal funds which will be utilized to promote the election of the candidate shall be
2 deposited in the account prior to expenditure.²⁵

3 All campaign expenditures shall be made from the account.²⁶

4 Duty to File Campaign Statements

5 At the core of the Act's campaign reporting system is the requirement that candidates and
6 committees must file campaign statements and reports for certain periods and by certain deadlines. The
7 Act requires candidates and their controlled committees to file campaign statements at specific times
8 disclosing information regarding contributions received and expenditures made by the campaign
9 committees.²⁷

10 Filing Due Dates

11 Whenever the Act requires that a statement or report be filed prior to or not later than a specified
12 date, and the deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for such a
13 statement or report shall be extended to the next regular business day.²⁸ This extension does not apply to
14 24-hour contribution reports when the due date falls on a Saturday, Sunday, or official state holiday
15 immediately prior to an election.²⁹

16 Pre-Election Campaign Statements

17 All candidates appearing on the ballot to be voted on at the next election, their controlled
18 committees, and committees primarily formed to support or oppose an elected officer, candidate, or a
19 measure appearing on the ballot to be voted on at the next election shall file the applicable preelection
20 statements specified in Section 84200.8.³⁰

21 Applicable pre-election campaign statements shall be filed as follows: (1) for the period ending
22 45 days before the election, the statement shall be filed no later than 40 days before the election, and
23 (2) for the period ending 17 days before the election the statement shall be filed no later than 12 days
24 before the election.³¹

25 _____
26 ²⁵ Section 85201, subdivision (d).

27 ²⁶ Section 85201, subdivision (e).

28 ²⁷ Section 84200, *et seq.*

²⁸ Section 81005, subdivision (a) [effective 2019]; Regulation 18116, subdivision (a) [2018].

²⁹ Section 81005, subdivision (b)(1) [effective 2019]; Regulation 18116, subdivision (b)(1) [2018].

³⁰ Section 84200.5, subdivision (a).

³¹ Section 84200.8, subdivisions (a)-(b).

1 24-Hour Contribution Reports

2 A “late contribution” includes a contribution, including a loan, that totals in the aggregate \$1,000
3 or more and is made to or received by a candidate or a controlled committee during the 90-day period
4 preceding the date of the election, or on the date of the election, at which the candidate is to be voted
5 on.³² Each committee that receives a late contribution shall report the late contribution within 24 hours
6 of the time it is received.³³

7 Semi-Annual Campaign Statements

8 Recipient committees shall file semi-annual campaign statements each year no later than July 31
9 for the period ending June 30, and no later than January 31 for the period ending December 31 if they
10 have made contributions or independent expenditures, including payments to a slate mailer organization,
11 during the six-month period before the closing date of the statements.³⁴

12 Advertisement Disclosure

13 An advertisement is any general or public communication that is authorized and paid for by a
14 committee for the purpose of supporting or opposing one or more candidates for elective office or one
15 or more ballot measures.³⁵ Any advertisement paid for by a committee must include the words “Paid
16 for by”³⁶ or “Ad paid for by”³⁷ followed by the name of the committee as it appears on the most recent
17 Statement of Organization filed with the Secretary of State.

18 There are additional disclosure requirements, depending on the type of advertisement. An
19 advertisement that is made via a form of electronic media that allows users to engage in discourse and
20 post content, or any other type of social media, that is paid for by a candidate controlled committee
21 established for an elective office of the controlling candidate, and that does not support or oppose a
22 ballot measure and is not paid for by an independent expenditure, must include “Ad paid for by”
23 followed by the name of the committee in a contrasting color that is easily readable by the average
24
25

26 ³² Section 82036, subdivision (a).

27 ³³ Section 84203, subdivision (a).

28 ³⁴ Section 84200 (a).

³⁵ Section 84501.

³⁶ Section 84502, subdivision (a)(2) [2018].

³⁷ Section 84502, subdivision (a)(2) [2022].

1 viewer and in no less than 10-point font on the cover or header photo of the committee’s profile,
2 landing page, or similar location.³⁸

3 Additionally, an “online platform disclosed advertisement” is a paid electronic media
4 advertisement on an online platform made via a form of electronic media that allows users to engage in
5 discourse and post content, or any other type of social media, for which the committee pays the online
6 platform.³⁹ A committee that disseminates an online platform disclosed advertisement must expressly
7 notify the online platform that the advertisement is an advertisement as defined in Section 84501,⁴⁰
8 provide the online platform with the name of the committee as it appears on the most recent Statement
9 of Organization,⁴¹ provide the online platform with the name of the candidate to which the
10 advertisement refers and the office to which the candidate is seeking election,⁴² and provide the online
11 platform with the name and identification number of the committee that paid for the advertisement.⁴³

12 Mass Mailings

13 “Mass mailing” means over 200 substantially similar pieces of mail.⁴⁴ No candidate, candidate
14 controlled committee established for an elective office for the controlling candidate, or political party
15 committee shall send a mass mailing unless the name, street address, and city of the candidate or
16 committee are shown on the outside of each piece of mail in the mass mailing and on at least one of the
17 inserts included within each piece of mail of the mailing in no less than 6-point type that is in a color or
18 print that contrasts with the background so as to be easily legible.⁴⁵ A post office box may be stated in
19 lieu of a street address if the organization’s address is a matter of public record with the Secretary of
20 State.⁴⁶

21 No candidate, candidate controlled committee established for an elective office for the
22 controlling candidate, or political party committee shall send a mass electronic mailing unless the name
23

24 ³⁸ Section 84504.4, subdivision (b) [2022].

25 ³⁹ Section 84504.6, subdivision (a)(2)(A)(i).

26 ⁴⁰ Section 84504.6, subdivision (b)(1).

27 ⁴¹ Section 84504.6, subdivision (b)(2).

28 ⁴² Section 84504.6, subdivision (b)(3).

⁴³ Section 84504.6, subdivision (b)(4).

⁴⁴ Section 82041.5.

⁴⁵ Section 84305, subdivision (a).

⁴⁶ *Id.*

1 of the candidate or committee is shown in the electronic mailing preceded by the words “Paid for by” in
2 at least the same size font as a majority of the text in the electronic mailing.”⁴⁷

3 Joint and Several Liability of Candidate, Committee and Treasurer

4 It is the duty of a committee’s treasurer – including a candidate who is acting as the committee
5 treasurer – to ensure that the committee complies with all of the requirements of the Act.⁴⁸ A
6 committee’s treasurer may be held jointly and severally liable, along with the candidate and committee,
7 for violations committed by the committee.⁴⁹

8 Liability for Violations

9 Any person who violates any provision of the Act is liable for administrative penalties up to
10 \$5,000 per violation.⁵⁰

11 Candidate Statement of Economic Interests

12 Every candidate for an elective office that is designated in a conflict of interest code shall file a
13 statement of economic interests (“Candidate SEI”) disclosing their investments, business positions,
14 interests in real property, and income received during the immediately preceding 12 months, as
15 enumerated in the disclosure requirements for that position.⁵¹ In 2018, the conflict of interest code for
16 the Mission Springs Water District specified that members of the Board of Directors were public
17 officials who managed public investments. The Act required public officials who manage public
18 investments to disclose all reportable investments, interests in real property, and sources of income.⁵²
19 The Candidate SEI must be filed with the election official with whom the candidate’s declaration of
20 candidacy or other nomination documents to appear on the ballot are required to be filed and must be
21 filed no later than the final filing date for the declaration or nomination documents.⁵³

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25 _____
26 ⁴⁷ Section 84305, subdivision (c)(1) and Regulation 18435.

27 ⁴⁸ Sections 81004, 84100 and 84104, and Regulation 18427.

28 ⁴⁹ Sections 83116.5 and 91006 and Regulation 18316.6.

⁵⁰ Sections 83116 and 83116.5.

⁵¹ Section 87302.3.

⁵² Section 87200.

⁵³ Section 87302.3.

1 **SUMMARY OF THE EVIDENCE**

2 The 2018 Committee Violations

3 According to records maintained by the Riverside County Registrar of Voters (“Riverside
4 County ROV”), on August 9, 2018, Grasha filed a statement of intention to be a candidate for the
5 Mission Springs Water District Board during the November 6, 2018 General Election. Grasha also filed
6 a candidate campaign statement-short form on August 9, 2018, which states that a candidate does not
7 anticipate receiving contributions or making expenditures totaling \$2,000 or more during the calendar
8 year.

9 According to invoices provided by Grasha, Grasha qualified as a committee on or around
10 September 16, 2018, by making two expenditures of \$950 and \$1,395.36 for advertisements promoting
11 Grasha’s candidacy. The Committee and Grasha were required to file a statement of organization with
12 the Secretary of State within 10 days after the committee qualified but failed to do so.

13 Since Grasha was listed as a candidate on the November 6, 2018 election ballot, the Committee
14 and Grasha were required to file the first pre-election campaign statement with the Riverside County
15 ROV by the September 27, 2018 deadline but failed to do so.

16 The Committee and Grasha were then required to file the second pre-election campaign
17 statement with the Riverside County ROV by the October 25, 2018 deadline but failed to do so.

18 The 90-day period preceding the November 6, 2018 General Election began on August 8, 2018.
19 Invoices for advertisements purchased by Grasha reveal that Grasha made several contributions to the
20 2018 Committee within this period that required 24-hour contribution reports:

STATEMENT/REPORT	REPORTING PERIOD	DUE DATE	DATE FILED	AMOUNT
24-Hour Contribution Report	9/11/2018	9/12/2018	Not Filed	\$1,395.36
24-Hour Contribution Report	9/23/2018	9/24/2018	Not Filed	\$1,500
24-Hour Contribution Report	10/17/2018	10/18/2018	Not Filed	\$3,154.60
24-Hour Contribution Report	10/26/2018	10/29/2018 ⁵⁴	Not Filed	\$3,154.60
24-Hour Contribution Report	10/30/2018	10/31/2018	Not Filed	\$3,154.60

26 The 2018 Committee and Grasha were required to file subsequent semi-annual campaign
27 statements for the reporting periods of October 21, 2018 through December 31, 2018 by January 31,
28

⁵⁴ October 26, 2018 fell on a Friday, so the filing deadline was the following Monday.

2019 and January 1, 2019 through June 30, 2019 by July 31, 2019. As of the date of this Report, the Committee and Grasha have failed to file any of the outstanding 24-hour contribution reports, pre-election campaign statements, and semi-annual campaign statements with the Riverside County ROV.

Upon the filing of the statement of intention, Grasha was required to establish one campaign bank account. Since Grasha made contributions to the 2018 Committee of more than \$2,000, the Committee and Grasha were required to report the financial institution and account number on the committee’s statement of organization. Since Grasha failed to file a statement of organization, no campaign bank account was disclosed. Further, the Enforcement Division has received no evidence that any campaign bank account exists for Grasha’s 2018 campaign.

Records obtained by the Enforcement Division reveal that prior to the November 6, 2018 election, Grasha made a total of \$15,034.86 in expenditures for a variety of advertisements promoting Grasha’s candidacy. Since the Committee and Grasha failed to establish a campaign bank account, all campaign contributions and expenditures failed to source through one designated campaign bank account.

The advertisements included 600 yard signs, 10,600 slate card mailers, Facebook ads on four separate occasions, 5,000 postcards distributed three times, and six mass emails which reached 12,000 recipients. Most of these advertisements included advertisement disclosures, but the following mass emails failed to include Grasha’s name, or the name of the Committee preceded by the words “Paid for by”:

DATE	MASS EMAILS	NUMBER SENT	DISCLOSURE
10/5/2018	Title: “Elect Steve Grasha – Mission Springs Water District”	2,000	Missing “Paid for by” and Candidate or Committee name
10/7/2018	Title: “New Leadership for Mission Springs Water District – Elect Steve Grasha, Director”	2,000	Missing “Paid for by” and Candidate or Committee name
10/12/2018	Title: “Absentee Ballots Have Arrived – Vote for Steve Grasha – Mission Springs Water District – Vote by Mail”	2,000	Missing “Paid for by” and Candidate or Committee name
10/15/2018	Title: “Steve Grasha for MSWD – We Know Him and We Trust Him with the Experience to Lead”	2,000	Missing “Paid for by” and Candidate or Committee name
10/26/2018	Title: “I Am Overwhelmed by the Support I Have Received Across the	2,000	Missing “Paid for by” and Candidate or Committee name

1		Mission Springs Water District and Desert Hot Springs”		
2	11/4/2018	Title: “Nude Photo of MSWF Director ... Sparks Massive Sex Offender Raid in Desert Hot Springs Area”	2,000	Missing “Paid for by” and Candidate or Committee name

4 Grasha Candidate SEI Violation

5 According to records maintained by the Riverside County ROV, as a candidate listed on the
6 November 6, 2018 election ballot, on August 9, 2018, Grasha filed a Candidate SEI which covered the
7 period of August 8, 2017 through August 8, 2018. Grasha was required to disclose investments, business
8 positions, interests in real property, and income received during the preceding 12 months. Grasha
9 reported no interests on the Candidate SEI.

10 According to records maintained by the Mission Springs Water District, on December 13, 2018,
11 Grasha assumed office with the Mission Springs Water District Board and timely filed the Assuming
12 Office SEI, which covered the period of December 13, 2017 through December 13, 2018. On the
13 Assuming Office SEI, Grasha reported income relating to ownership in True Fog, USA, with gross
14 income estimated between \$10,001-\$100,000. Grasha also reported ownership in an exclusive
15 membership at a private RV Park estimated between \$100,001-\$1,000,000.

16 Since the two statement reporting periods overlap, the Assuming Office SEI revealed that Grasha
17 had interests in True Fog, USA and the private RV Park prior to August 8, 2018 and failed to report each
18 interest on the Candidate SEI. Per the Riverside County ROV, Grasha has not filed an amendment to the
19 Candidate SEI to include these interests.

20 The 2022 Committee Violations

21 Grasha was a successful candidate in the November 8, 2022 General Election for Desert Water
22 Agency, Division 1.

23 On September 6, 2022, the 2022 Committee and Grasha filed a statement of organization with
24 the Riverside County ROV indicating the Committee had qualified on August 16, 2022. However,
25 according to SOS records, the 2022 Committee and Grasha failed to file the statement of organization
26 with the SOS and therefore did not receive a committee identification number. As of the date of this
27 Report, no statement of organization has been filed with the Secretary of State.

1 According to 24-hour contribution reports filed with the Riverside County ROV, the Committee
2 reported receiving four contributions as follows:

DATE RECEIVED	CONTRIBUTOR	AMOUNT	DUE DATE	DATE FILED
8/31/2022 ⁵⁵	Steve Grasha	\$10,000	9/1/2022	9/19/2022
10/7/2022	Steve Grasha	\$5,000	10/10/2022 ⁵⁶	10/19/2022
10/7/2022	Steve Grasha	\$5,000	10/10/2022 ⁵⁷	10/26/2022
11/3/2022	Steve Grasha	\$5,000	11/4/2022	11/8/2022

3
4
5
6
7 Since Grasha was listed as a candidate on the November 8, 2022 election ballot, the 2022
8 Committee and Grasha were required to file the first pre-election campaign statement by September 29,
9 2022 and the second pre-election campaign statement by October 27, 2022 but, according to filing
10 officer records, they have failed to do so. The 2022 Committee and Grasha were required to file the
11 subsequent semi-annual campaign statement for the reporting period of October 23, 2022 through
12 December 31, 2022 by January 31, 2023 but failed to do so. As of the date of this Report, the Committee
13 and Grasha have failed to file the outstanding semi-annual and pre-election campaign statements.

14 The Facebook Ad Library shows that Grasha paid for six Facebook ads from September 30,
15 2022 to October 8, 2022 totaling \$400 - \$499. Each ad stated "Paid for by Steve Grasha" and was
16 missing the name of the committee. An additional nine Facebook ads were purchased by Grasha from
17 October 9, 2022 to October 27, 2022 totaling \$2,000 - \$2,500. Each ad stated "Paid for by Steve
18 Grasha" and was also missing the name of the committee. The Committee created a Facebook and a
19 Twitter account that also failed to include the required "Paid for by" and committee name disclosure.

20 According to records obtained during the investigation, Grasha paid for 4,400 mailers on five
21 separate occasions between October 6, 2022 and November 1, 2022 totaling \$15,257.71. Each of the
22 following mass mailings failed to include the words "Paid for by:"

23
24 ///

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26 _____
27 ⁵⁵ The filed 24-hour contribution report disclosed the date the contribution was received as September 31, 2022. This
28 appears to be a typographical error because September has only 30 calendar days, the date of the filing was reported by the
Committee as September 1, 2022, and the report was date-stamped by the Riverside County ROV on September 19, 2022. It
appears that the date received was either August 31, 2022 or September 1, 2022, with the corresponding deadlines of either
September 1, 2022 or September 2, 2022.

⁵⁶ October 7, 2022 fell on a Friday, so the filing deadline was the following Monday.

⁵⁷ October 7, 2022 fell on a Friday, so the filing deadline was the following Monday.

DATE	COST	NUMBER SENT	DISCLOSURE
10/6/2022	\$3,326.91	4,400	Missing "Paid for by"
10/17/2022	\$3,326.91	4,400	Missing "Paid for by"
10/21/2022	\$3,065.29	4,400	Missing "Paid for by"
10/28/2022	\$2,915.29	4,400	Missing "Paid for by"
11/1/2022	\$2,623.31	4,400	Missing "Paid for by"

VIOLATIONS

The 2018 Committee and Grasha

Count 1: Failure to Timely File Statement of Organization

The 2018 Committee and Grasha failed to timely file a statement of organization with the Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of Government Code Section 84101.

Count 2: Failure to Timely File 24-Hour Contribution Report

The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,395 contribution received on September 11, 2018 by the September 12, 2018 due date, in violation of Government Code Section 84203.

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

The 2018 Committee and Grasha failed to timely file the first pre-election campaign statement for the reporting period of July 1, 2018 through September 22, 2018 by the September 27, 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 4: Failure to Timely File 24-Hour Contribution Report

The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,500 contribution received on September 23, 2018 by the September 24, 2018 due date, in violation of Government Code Section 84203.

Count 5: Failure to Timely File 24-Hour Contribution Report

The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$3,154.60 contribution received on October 17, 2018 by the October 18, 2018 due date, in violation of Government Code Section 84203.

///

1 Count 6: Failure to Timely File Pre-Election Campaign Statement

2 The 2018 Committee and Grasha failed to timely file the second pre-election campaign statement
3 for the reporting period of September 23, 2018 through October 20, 2018 by the October 25, 2018 due
4 date, in violation of Government Code Sections 84200.5 and 84200.8.

5 Count 7: Failure to Timely File 24-Hour Contribution Report

6 The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
7 \$3,154.60 contribution received on October 26, 2018 by the October 29, 2018 due date, in violation of
8 Government Code Section 84203.

9 Count 8: Failure to Timely File 24-Hour Contribution Report

10 The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
11 \$3,154.60 contribution received on October 30, 2018 by the October 31, 2018 due date, in violation of
12 Government Code Section 84203.

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

14 The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for the
15 reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date, in
16 violation of Government Code Section 84200.

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

18 The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for the
19 reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due date, in violation of
20 Government Code Section 84200.

21 Count 11: Failure to Establish Campaign Bank Account

22 The 2018 Committee and Grasha failed to make all campaign expenditures, totaling
23 approximately \$15,748.96, from a single designated campaign bank account, in violation of Government
24 Code Section 85201.

25 Count 12: Failure to Include Proper Disclosure on Mass Email

26 The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
27 distributed on October 5, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
28

1 Count 13: Failure to Include Proper Disclosure on Mass Email

2 The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
3 distributed on October 7, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

4 Count 14: Failure to Include Proper Disclosure on Mass Email

5 The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
6 distributed on October 12, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

7 Count 15: Failure to Include Proper Disclosure on Mass Email

8 The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
9 distributed on October 15, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

10 Count 16: Failure to Include Proper Disclosure on Mass Email

11 The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
12 distributed on October 26, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

13 Count 17: Failure to Include Proper Disclosure on Mass Email

14 The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
15 distributed on November 4, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

16 Grasha as a Candidate

17 Count 18: Failure to Timely Disclose Interests on Candidate Statement of Economic Interest

18 Grasha failed to timely disclose income and interests in real property on the Candidate Statement
19 of Economic Interests, in violation of Government Code Section 87302.3.

20 The 2022 Committee and Grasha

21 Count 19: Failure to Timely File Statement of Organization

22 The 2022 Committee and Grasha failed to timely file a statement of organization with the
23 Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of
24 Government Code Section 84101.

25 Count 20: Failure to Timely File 24-Hour Contribution Report

26 The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a \$10,000
27 contribution received on or about August 31, 2022 by the due date of or about September 1, 2022, in
28 violation of Government Code Section 84203.

1 Count 21: Failure to Timely File Pre-Election Campaign Statement

2 The 2022 Committee and Grasha failed to timely file the first pre-election campaign statement
3 for the reporting period of July 1, 2022 through September 24, 2022 by the September 29, 2022 due
4 date, in violation of Government Code Sections 84200.5 and 84200.8.

5 Count 22: Failure to Timely File 24-Hour Contribution Report

6 The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a \$5,000
7 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation of Government
8 Code Section 84203.

9 Count 23: Failure to Timely File 24-Hour Contribution Report

10 The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a second
11 \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation of
12 Government Code Section 84203.

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

14 The 2022 Committee and Grasha failed to timely file the first pre-election campaign statement
15 for the reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due
16 date, in violation of Government Code Sections 84200.5 and 84200.8.

17 Count 25: Failure to Timely File 24-Hour Contribution Report

18 The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a \$5,000
19 contribution received on November 3, 2022 by the November 4, 2022 due date, in violation of
20 Government Code Section 84203.

21 Count 26: Failure to Timely File Semi-Annual Campaign Statement

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

25 Count 27: Failure to Include Proper Disclosure on Social Media Page

26 The 2022 Committee and Grasha failed to include the proper advertisement disclosure on its
27 Facebook and Twitter landing pages, in violation of Government Code Section 84504.4, subdivision (b).
28

1 Count 28: Failure to Provide Required Information to Online Platform for Online Platform Disclosed
2 Advertisements

3 The 2022 Committee and Grasha failed to provide the online platform with the required
4 information for six online platform disclosed advertisements, resulting in incorrect advertisement
5 disclosures, between September 30, 2022 and October 8, 2022, in violation of Government Code Section
6 84504.6 subdivision (b).

7 Count 29: Failure to Provide Required Information to Online Platform for Online Platform Disclosed
8 Advertisements

9 The 2022 Committee and Grasha failed to provide the online platform with the required
10 information for nine online platform disclosed advertisements, resulting in incorrect advertisement
11 disclosures, between October 9, 2022 to October 27, 2022, in violation of Government Code Section
12 84504.6 subdivision (b).

13 Count 30: Failure to Include Proper Mass Mailing Disclosure

14 The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
15 distributed on or about October 6, 2022, in violation of Government Code Section 84305.

16 Count 31: Failure to Include Proper Mass Mailing Disclosure

17 The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
18 distributed on or about October 17, 2022, in violation of Government Code Section 84305.

19 Count 32: Failure to Include Proper Mass Mailing Disclosure

20 The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
21 distributed on or about October 21, 2022, in violation of Government Code Section 84305.

22 Count 33: Failure to Include Proper Mass Mailing Disclosure

23 The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
24 distributed on or about October 28, 2022, in violation of Government Code Section 84305.

25 Count 34: Failure to Include Proper Mass Mailing Disclosure

26 The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
27 distributed on or about November 1, 2022, in violation of Government Code Section 84305.
28

1 **EXCULPATORY INFORMATION**

2 Grasha’s name, face, and other identifiers appeared on several of the advertisements, limiting the
3 public harm.

4 **OTHER RELEVANT EVIDENCE**

5 Steve Grasha was a candidate twice previously, once for Palm Springs City Council, and once
6 for Coachella Valley Water District. Grasha established campaign committees under the Act for each of
7 these campaigns, so Grasha was aware of the required filing obligations. Both of Grasha’s campaign
8 committees for these offices were administratively terminated by the Commission (FPPC Case Nos.
9 16/525 and 18/968).

10 Additionally, Grasha did not cooperate with Enforcement Division during its investigation of this
11 matter. Grasha avoided proactive phone calls by the Enforcement Division before the 2018 Election to
12 gain compliance, and Grasha did not communicate with the Enforcement Division until after the 2018
13 Election. Grasha also refused to provide bank and committee records claiming Grasha was not required
14 to do so. Because of this refusal, the Enforcement Division issued subpoenas to obtain the records. In
15 2022, Grasha engaged in similar behavior regarding efforts by the Enforcement Division to obtain
16 compliance and cooperation from Grasha.

17 **CONCLUSION**

18 Probable cause exists to believe Respondents, Steve Grasha, Steve Grasha for Mission Springs
19 Water District 2018, and Steve Grasha for Desert Water Agency 2022, committed 34 violations of the
20 Act, as detailed above. The Enforcement Division respectfully requests an order finding probable cause
21 pursuant to Section 83115.5 and Regulation 18361.4.

22
23 Respectfully Submitted,

24 Dated: 8/1/2023

FAIR POLITICAL PRACTICES COMMISSION

Christopher B. Burton
Acting Enforcement Chief

26 

27 By: Angela J. Brereton
Assistant Chief
28 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, 1102 Q Street, Suite 3050, Sacramento, California 95811. On August 1, 2023 I served the following document(s):

1. Letter dated August 1, 2023 from Angela J. Brereton;
2. FPPC Case No. 2018-01268 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;
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings; and
6. Probable Cause Checklist.

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

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

SERVICE LIST

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
c/o Desert Water Agency
1200 S Gene Autry Trail
Palm Springs, CA 92264

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
c/o Two Springs R.V. Resort
14200 N Indian Canyon Drive
North Palm Springs, CA 92258

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
97 Moonlight Drive
North Palm Springs, CA 92258

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
P.O. Box 580460
North Palm Springs, CA 92258

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
1015 Saint Lucia Cir
Palm Springs, CA 92264

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 1, 2023.




7020 0640 0002 2861 5166

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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	\$

Postmark
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Postage

\$ To Steve Grasha for Desert Water Agency 2022

\$ St c/o Two Springs R.V. Resort

\$ Si 14200 N Indian Canyon Drive

\$ C North Palm Springs, CA 92258

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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Extra Services & Fees (check box, add fee as appropriate)	
<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	\$

Postmark
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Postage

\$ To Steve Grasha for Desert Water Agency 2022

\$ Se c/o Desert Water Agency

\$ Si 1200 S Gene Autry Trail

\$ C Palm Springs, CA 92264

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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

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Postage

\$ To Steve Grasha for Desert Water Agency 2022

\$ St 1015 Saint Lucia Cir

\$ Si Palm Springs, CA 92264

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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<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

\$ To Steve Grasha for Desert Water Agency 2022

\$ Se P.O. Box 580460

\$ Si North Palm Springs, CA 92258

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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Extra Services & Fees (check box, add fee as appropriate)	
<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	\$

Postmark
Here

Postage

\$ To Steve Grasha for Desert Water Agency 2022

\$ St 97 Moonlight Drive

\$ Si North Palm Springs, CA 92258

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Shaina -

2018-01268

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United States
Postal Service

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Fair Political Practices Commission
1102 Q Street, Suite 3000 3050
Sacramento, California 95811

RECEIVED
FAIR POLITICAL
PRACTICES COMMISSION
2023 AUG -9 PM 2:12

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

■ 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.

1. Article Addressed to:

Steve Grasha for Desert Water Agency 2022
c/o Desert Water Agency
1200 S Gene Autry Trail
Palm Springs, CA 92264

2. Article Number (Transfer from service label)

020 0640 0002 2861 5159

3. Service Type

Adult Signature
 Adult Signature Restricted Delivery
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A. Signature
X [Signature] Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery
8/7/23

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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Exhibit A-3



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

August 1, 2023

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

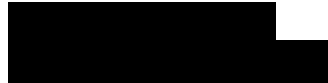
Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
c/o Desert Water Agency
1200 S Gene Autry Trail
Palm Springs, CA 92264

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
c/o Two Springs R.V. Resort
14200 N Indian Canyon Drive
North Palm Springs, CA 92258

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
97 Moonlight Drive
North Palm Springs, CA 92258

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
P.O. Box 580460
North Palm Springs, CA 92258

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022



In The Matter of Steve Grasha; FPPC Case No. 2018-01268

Dear Steve Grasha:

The Enforcement Division of the Fair Political Practices Commission (the “Commission”) is proceeding with an administrative action against you for your failure to comply with the filing and disclosure provisions of the Political Reform Act (the “Act”). The enclosed Report in Support of a Finding of Probable Cause (the “Report”) contains a summary of the alleged violations and the relevant law and evidence.

You have the right to file a written response to the Report. That response may contain any information you think is relevant and that you wish to bring to the attention of the Hearing Officer. In your response, please indicate whether you would like the Hearing Officer to make a determination of probable cause based on the written materials alone (the Report and your response) or request a conference, during which you may orally present your case to the Hearing Officer. Probable cause conferences are held in our office, which is located at 1102 Q Street, Ste. 3050, Sacramento, CA 95811. You may appear at the conference in person or by telephone and you are entitled to be represented by counsel. ***If you wish to submit a written response or request a probable cause conference, it must be filed with the Commission Assistant at the address listed above, or at CommAsst@fppc.ca.gov within 21 days from the date of service of this letter. You can also reach the Commission Assistant at (916) 327-8269.***

Please note that probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether there is probable cause to believe that the Act was violated. However, settlement discussions are encouraged by the Commission and may take place at any time except during a probable cause conference. ***If you are interested in reaching a settlement in this matter, please contact me at (916) 322-5771 or abreron@fppc.ca.gov.***

Finally, you have the right to request certain records in the possession of the Enforcement Division. ***This request must also be filed with the Commission Assistant by mail at the address above or email at CommAsst@fppc.ca.gov, within 21 days from the date of service of this letter.*** Should you request records, the Enforcement Division will provide such records by email or U.S. mail to all respondents, with a copy to the Commission Assistant. From the date you are served with the records, you would have an additional 21 days to file a written response to the Report, just as described above.

Should you take no action within 21 days from the date of service of this letter, your rights to respond and to request a conference will be waived and the Enforcement Division will independently pursue the issuance of an accusation.

For your convenience, I have enclosed a fact sheet on probable cause proceedings and copies of the most relevant statutes and regulations.

Sincerely,

Angela J. Brereton

Angela J. Brereton
Assistant Chief, Enforcement Division

*Enclosures: Report in Support of a Finding of Probable Cause; Probable Cause Proceedings
Fact Sheet; Relevant Probable Cause Statutes and Regulations; Probable Cause Checklist*

PROBABLE CAUSE FACT SHEET

INTRODUCTION

The Fair Political Practices Commission is required by law to determine whether probable cause exists to believe that the Political Reform Act (the “Act”) was violated before a public administrative accusation may be issued.

The probable cause proceedings before the Fair Political Practices Commission are a unique, informal proceeding, and most respondents and their attorneys are unfamiliar with them. Therefore, we have prepared this summary to acquaint you with the process.

THE LAW

Government Code sections 83115.5 and 83116 set forth the basic requirement that a finding of probable cause be made in a “private” proceeding before a public accusation is issued and a public hearing conducted in accordance with the Administrative Procedure Act.

The Commission has promulgated regulations further defining the probable cause procedure and delegating to the General Counsel (the “Hearing Officer” for purposes of these proceedings) the authority to preside over such proceedings and decide probable cause. A copy of these statutes and regulations are attached for your convenience.

In summary, the statutes and regulations entitle you to the following:

- a) A written probable cause report containing a summary of the law alleged to have been violated, and a summary of the evidence, including any exculpatory evidence indicating a violation alleged in the report did not occur;
- b) The opportunity to request records, respond in writing, and to request a probable cause conference within 21 days of service of the probable cause report;
- c) If the Commission met to consider whether a civil lawsuit should be filed in this matter, a copy of any staff memoranda submitted to the Commission and a transcript of staff discussions with the Commission at any such meeting; and
- d) If a timely request was made, a non-public conference with the General Counsel and the Enforcement Division staff to consider whether or not probable cause exists to believe the Act was violated.

THE PROCEDURE

Probable Cause Report

Administrative enforcement proceedings are commenced with the service, by registered or certified mail or in person, of a probable cause report. The report will contain a written summary of the law and evidence that supports a finding of probable cause that each alleged violation of the Act has occurred, as well as a description of any exculpatory evidence indicating a violation alleged in the report did not occur. It is filed with the Hearing Officer.

Records

Within 21 calendar days following the service of the probable cause report, you may request all records in the possession of the Enforcement Division obtained for purposes of that investigation that are not readily available public records or otherwise in the possession of the requesting respondent. Records that are confidential, were received in response to an administrative subpoena, or otherwise contain protected information, will be withheld.

This request must be sent by mail or email to the Commission Assistant.

Response to Probable Cause Report

Within 21 calendar days following the service of the probable cause report or, within 21 calendar days from the service of the records, you may submit a response to the Report. By regulation, the written response should contain, "... a summary of law and evidence, that supports a finding that the probable cause report fails to establish probable cause that any or all of the alleged violations of the Act occurred."²

You must file your response with the Commission Assistant.

Staff Reply

Not later than 14 calendar days following the date the response was filed with the Commission Assistant, Commission staff may submit any evidence or argument in rebuttal. You will be served with a copy of any such reply.

Probable Cause Conference

Probable cause conferences are held at the offices of the Fair Political Practices Commission, which is located at 1102 Q Street, Suite 3050, Sacramento, CA 95811. You may appear at the conference in person or by telephone. The proceedings are not public unless the alleged violator files with the Commission a written request that the proceeding be public. Otherwise, the probable cause report, any written responses, and the probable cause conference itself are confidential.

Unless the probable cause conference is public, the only persons who may attend are the staff of the Commission, any proposed respondent and his or her attorney or representative, and, at the discretion of the Hearing Officer, witnesses.

The Hearing Officer may, but need not, permit testimony from witnesses. Probable cause conferences are less formal than court proceedings. The rules of evidence do not apply. The conferences will be recorded and a copy of the recording will be provided upon request.

Since it has the burden of proof, the Enforcement Division is permitted to open and close the conference presentations. The Hearing Officer may also hold the record open to receive additional evidence or arguments.

¹ But see 2 CCR § 18362, which states that the Commission provides access to complaints, responses to complaints, and investigative files and information in accordance with the requirements of the Public Records Act (Govt. Code § 6250, et seq.).

² 2 CCR § 18361.4, subd. (d)(1).

The Hearing Officer will find probable cause to exist when the evidence sufficiently supports a reasonable belief or strong suspicion that the Act has been violated.³

Ordinarily, probable cause determinations are made based upon the written probable cause report, any written response by the respondent, any written rebuttal by the Enforcement Division, and the oral arguments presented at the conference. Timely written presentations are strongly recommended.

Every reasonable effort is made to accommodate the schedules of parties and counsel (filling out the attached Probable Cause Checklist aides in this effort). The conference shall proceed no later than 75 days after receipt by the Commission Assistant of the filed request for a probable cause conference, or 75 days after the date records are sent, unless the assigned hearing officer extends the time for good cause based on an extension request filed by any party with the Commission Assistant.

Probable Cause Order and Accusation

If the Hearing Officer finds probable cause, he will issue a Finding of Probable Cause, which will be publicly announced which includes the posting of a summary of the allegations on the Commission's website. An Accusation will be issued soon after the Finding of Probable Cause is publicly announced.

Settlements

Probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether or not there is probable cause to believe that the Political Reform Act was violated. Anyone who wishes to discuss settlement with the Enforcement Division may do so before or after the probable cause conference but not during the conference. The Hearing Officer will not participate in any settlement negotiations.

CONCLUSION

This fact sheet was intended to give you a brief summary of the probable cause process at the Fair Political Practices Commission. Such a summary cannot answer every question that might arise in such proceedings. Therefore, if you have any questions that are not addressed by this fact sheet or the copies of the law and regulations we have attached, feel free to contact the attorney whose name appears on the probable cause report.

Attachments: Relevant Sections of (1) California Government Code, and (2) Regulations of the Fair Political Practices Commission, Title 2, Division 6 of the California Code of Regulations.

³ 2 CCR §18361.4, subd. (a).

CALIFORNIA GOVERNMENT CODE

Probable Cause Statutes

§ 83115.5. Probable cause; violation of title; notice of violation; summary of evidence; notice of rights; private proceedings

No finding of probable cause to believe this title has been violated shall be made by the commission unless, at least 21 days prior to the commission's consideration of the alleged violation, the person alleged to have violated this title is notified of the violation by service of process or registered mail with return receipt requested, provided with a summary of the evidence, and informed of his 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 this title. 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. A proceeding held for the purpose of considering probable cause shall be private unless the alleged violator files with the commission a written request that the proceeding be public.

§ 83116. Violation of title; probable cause; hearing; order

When the Commission determines there is probable cause for believing this title has been violated, it may hold a hearing to determine if a violation has occurred. Notice shall be given and the hearing conducted in accordance with the Administrative Procedure Act (Chapter 5 (commencing with Section 11500), Part 1, Division 3, Title 2, Government Code). The Commission shall have all the powers granted by that chapter. When the Commission determines on the basis of the hearing that a violation has occurred, it shall issue an order that may require the violator to do all or any of the following:

- (a) Cease and desist violation of this title.
- (b) File any reports, statements, or other documents or information required by this title.
- (c) Pay a monetary penalty of up to five thousand dollars (\$5,000) per violation to the General Fund of the state. When the Commission determines that no violation has occurred, it shall publish a declaration so stating.

**REGULATIONS OF THE FAIR POLITICAL PRACTICES COMMISSION
TITLE 2, DIVISION 6 OF THE CALIFORNIA CODE OF REGULATIONS**

Probable Cause Regulations

§ 18361 (b). Delegation by the Executive Director Pertaining to Enforcement Proceedings and Authority to Hear Probable Cause Proceedings.

Probable cause proceedings under Regulation 18361.4 shall be heard by the General Counsel or an attorney from the Legal Division. The General Counsel may delegate the authority to hear probable cause proceedings, in writing, to an administrative law judge.

§ 18361.4. Probable Cause Proceedings

(a) Probable Cause. Under Sections 83115.5 and 83116, probable cause exists when the evidence sufficiently supports a reasonable belief or strong suspicion that the Act has been violated.

(b) Probable Cause Report. To commence probable cause proceedings pursuant to Sections 83115.5 and 83116, the Chief of Enforcement shall direct Enforcement Division staff to prepare a probable cause report that contains a written summary of the law and evidence that supports a finding of probable cause that each alleged violation of the Act has occurred, as well as a description of any exculpatory evidence indicating a violation alleged in the report did not occur. The probable cause report may include hearsay evidence, including declarations of investigators or others relating the statements of witnesses or concerning the examination of physical evidence.

(c) No probable cause hearing will take place until at least 21 calendar days after Enforcement Division staff provides the following, by service of process or registered or certified mail with return receipt requested, to each respondent:

- (1) A copy of the probable cause report;
- (2) Notification that each respondent has the right to respond in writing to the probable cause report and to request a probable cause conference at which the respondent may be present in person and represented by counsel, notification of all deadlines to file a written response, and request a probable cause conference;
- (3) If the Commission met in executive session on this matter pursuant to Regulation 18361.2, a copy of any staff memoranda submitted to the Commission at that time along with the recording of any discussion between the Commission and the staff at the executive session as required in subdivision (b) of Regulation 18361.2; and
- (4) A probable cause checklist form which includes information regarding a respondent's options for a probable cause conference, written response, and evidence, as well as the respondent(s) best contact information, available dates, and preferred method of service.

(d) Response to Probable Cause Report; Request for Probable Cause Conference; Waiver.

- (1) Not later than 21 calendar days following service of the probable cause report, or the date records were sent pursuant to (d)(3), a respondent may submit a written response to the probable cause report. The response should contain a summary of law and evidence that supports a finding that the probable cause report fails to establish probable cause that any or all of the alleged violations of the Act occurred. Any response shall be filed with the

Commission Assistant by electronic mail at CommAsst@fppc.ca.gov or U.S. mail, who will send a copy, to all parties named in the probable cause report within 2 business days.

(2)

(A) Not later than 21 calendar days following service of the probable cause report, or the date records were sent pursuant to subdivision (d)(3), any respondent may request a probable cause conference which shall be filed with the Commission Assistant by electronic mail at CommAsst@fppc.ca.gov or U.S. mail, who will provide a copy to all other parties named in the probable cause report and forward the request to the hearing officer assigned to the matter from the Legal Division within two business days. The Commission Assistant shall schedule the probable cause conference and if the probable cause checklist has not been returned, make efforts to obtain the information from the respondent(s).

(B) If a respondent requests a probable cause conference later than 21 days following service of the probable cause report or the date records were sent pursuant to subdivision (d)(3), the assigned hearing officer may grant the request based on good cause, including a showing by respondent that they did not timely receive the probable cause report after it was served, or some other circumstance reasonably justifying respondent's failure to timely request the hearing. However, no late request for a probable cause conference shall be granted if the assigned hearing officer has already issued an order for an Accusation to be served on the respondent.

(C) The conference shall proceed no later than 75 days after receipt by the Commission Assistant of the filed request for a probable cause conference, or 75 days after the date records are sent pursuant to subdivision (d)(3), unless the assigned hearing officer extends the time for good cause based on an extension request filed by any party with the Commission Assistant. If respondent requests a probable cause conference but the probable cause conference does not timely proceed, the Commission assistant shall set a probable cause conference to occur within 14 calendar days and provide notice of the conference to all parties. The hearing officer shall conduct the conference informally.

(3) Within 21 calendar days following the service of the probable cause report, a respondent may request by electronic mail at CommAsst@fppc.ca.gov or U.S. mail a copy of all records in the possession of the Enforcement Division obtained for purposes of that investigation that are not readily available public records or otherwise in the possession of the requesting respondent, except records that it claims are confidential, were received in response to an administrative subpoena, or otherwise contain protected information, as required in subdivision (d)(3)(B). For purposes of this subdivision, the term "readily available public records" includes any statements, reports or other records available to the public in electronic format on a government agency website.

(A) The Enforcement Division will provide copies of the requested records upon payment of a fee for direct costs of duplication or provide electronically without cost. The Enforcement Division shall provide such records by electronic mail or U.S. mail to all respondents, with a copy to the Commission Assistant. A respondent may submit a written response to the probable cause report described in subsection (1) no later than 21 calendar days after the evidence is sent. The records produced by the Enforcement Division pursuant to this subdivision shall be considered the final production at the Probable Cause level and is not appealable.

(B) If requested by respondent, the Enforcement Division shall provide a description of records withheld, which shall include the following information:

- (i) the date of the record;
- (ii) the identity of the author(s);
- (iii) the identity of the recipient(s);
- (iv) the specific ground for which the objection to produce the record is made; and
- (v) the current location of the record.

(4) If a respondent fails to file a timely response, make a timely request for a probable cause conference, or appear for a probable cause conference, the respondent waives the right to further probable cause proceedings under Section 83115.5, and the Enforcement Division may transmit copies of the Probable Cause Report, Request for a Finding of Probable Cause, and Order that an Accusation be Prepared to the Commission Assistant requesting that a hearing officer from the Legal Division find probable cause based on the information provided. Upon a finding of probable cause, the hearing officer will issue an Order Finding Probable Cause and serve it on all parties.

(5) The hearing officer may extend any of the time limits in subdivision (d) if good causes exists.

(e) Rebuttal. Not later than 14 calendar days following the date the response was filed with the Commission Assistant, Enforcement Division staff may submit any evidence or argument in rebuttal to the response which shall be filed with the Commission Assistant by electronic mail at CommAsst@fppc.ca.gov who will provide a copy to all parties. These are the only briefings to be considered by the hearing officer when making the determination of probable cause.

(f) Probable Cause Conference. The conference shall be closed to the public unless a respondent requests, and all other respondents agree, to a public conference. If the conference is not public, then only the parties named in the probable cause report, their legal counsel or representative and Enforcement Division staff shall have the right to be present and participate. Any party may send a request to the Commission Assistant at least 7 days before the probable cause conference that the hearing officer allow witnesses to participate in the probable cause conference. The request shall identify each witness and summarize the subject of the witness's testimony, and be sent to all parties. The hearing officer, in making this determination, shall consider the relevancy of the witness' proposed testimony, whether the witness has a substantial interest in the proceedings, and whether fairness requires that the witness be allowed to participate. Representatives of any civil or criminal prosecutor with jurisdiction may attend the conference at the discretion of the hearing officer if they agree to respect the confidential nature of the proceedings. If the conference is not open to the public, then the conference may be conducted in whole or in part by telephone or videoconference. The Enforcement Division shall record the probable cause conference. The hearing officer may determine whether there is probable cause based solely on the probable cause report, any responses or rebuttals, evidence submitted, and any arguments presented at the probable cause conference by the parties. The hearing officer may, based on a showing of good cause, permit any party to submit additional evidence at or after the probable cause conference if the additional evidence is summarized at the probable cause conference. Only evidence that confirms or disproves a statement made at the probable cause conference may be submitted after the conference.

(g) Finding of Probable Cause. A finding of probable cause by the hearing officer does not

constitute a finding that a violation occurred. The hearing officer shall not make a finding of probable cause if presented with clear and convincing evidence that, at least 21 working days prior to the alleged violation, the respondent requested written advice from the Commission staff pursuant to Section 83114(b), disclosed truthfully all the material facts, and committed the acts complained of in reliance on formal advice of Commission staff or because of Commission staff's failure to provide advice. If the hearing officer makes a finding of probable cause, then the Enforcement Division shall prepare an Accusation pursuant to Section 11503 and have it served upon the person or persons who are subjects of the probable cause finding. The hearing officer shall publicly announce the finding of probable cause. The announcement shall contain a summary of the allegations and a cautionary statement that the respondent is presumed to be innocent of any violation of the Act unless a violation is proved in a subsequent proceeding. The Chief of the Enforcement Division shall be responsible for the presentation of the case in support of the Accusation at an administrative hearing held pursuant to Section 83116.

§ 18361.2. Memorandum Respecting Civil Litigation.

- (a) If the Executive Director concludes civil litigation should be initiated, he or she shall submit to the Commission a written memorandum, which shall be first reviewed by the General Counsel, or an attorney from the Legal Division, summarizing the facts and the applicable law of the case and recommending the initiation of a lawsuit. The memorandum shall include all exculpatory and mitigating information known to the staff.
- (b) The Commission shall review the memorandum at an executive session. The General Counsel, or an attorney from the Legal Division, and the Commission Assistant shall be in attendance. No other member of the staff may be present unless the Commission meets with a member of the staff for that person to answer questions. The Commission may not resume its deliberations until the person is no longer present. Any communication between the Commission and the person during the executive session shall be recorded. After review of the memorandum, the Commission may direct the Executive Director to do any of the following:
 - (1) Initiate civil litigation.
 - (2) Decide whether probable cause proceedings should be commenced pursuant to 2 Cal. Code of Regulations Section 18361.4.
 - (3) Return the matter to the staff for further investigation.
 - (4) Take no further action on the matter or take any other action it deems appropriate.
- (c) If the Commission decides to initiate civil litigation, the Commission may then permit other members of the staff to attend the executive session.
- (d) If the Executive Director deems it necessary, he or she may call a special meeting of the Commission to review a staff memorandum recommending the initiation of civil litigation.
- (e) It is the intent of the Commission in adopting this section to preserve for the members of the Commission the authority to decide whether alleged violations should be adjudicated in administrative hearings or in civil litigation, while at the same time avoiding the possibility that discussions with members of the staff might cause members of the Commission to prejudge a case that might be heard by the Commission under Government Code Section 83116.

PROBABLE CAUSE REPORT CHECKLIST

1. YOUR PROCEDURAL OPTIONS

- Request to have a Probable Cause Conference.
 - If you would like a conference, then no later than 21 calendar days following service of the Probable Cause Report, or the date records were sent, you may request a Probable Cause Conference with the Commission Assistant by email at CommAsst@fppc.ca.gov or U.S. mail at 1102 Q Street, Suite 3050, Sacramento, CA 95811.
 - You may appear on your own behalf or obtain counsel to represent you.
 - You may request to appear in-person, or remotely.
 - **PLEASE NOTE:** Failure to respond timely results in a waiver of your rights to further probable cause proceedings and the Enforcement Division may transmit copies of the Probable Cause Report, Request for a Finding of Probable Cause, and Order that an Accusation be Prepared to the Commission Assistant requesting that a hearing officer from the Legal Division find probable cause based on the information provided. Upon a finding of probable cause, the hearing officer will issue an Order Finding Probable Cause and serve it on all parties.
- Respond to the Probable Cause Report in Writing.
 - No later than 21 calendar days following service of the Probable Cause Report, or the date records were sent to you, you may submit a written response to the Probable Cause Report. The response should contain a summary of law and evidence that supports a finding that the Probable Cause Report fails to establish probable cause that any or all of the alleged violations of the Act occurred.
 - Any response needs to be filed with the Commission Assistant by email at CommAsst@fppc.ca.gov or U.S. mail at 1102 Q Street, Suite 3050, Sacramento, CA 95811.
 - **Rebuttal.** Not later than 14 calendar days following the date your response was filed with the Commission Assistant, Enforcement Division staff may submit a rebuttal to your response which shall be filed with the Commission Assistant, who will provide a copy to all parties.
- Request Records.
 - Within 21 calendar days following the service of the Probable Cause Report, you may request by email at CommAsst@fppc.ca.gov or U.S. mail, a copy of all records in the possession of the Enforcement Division obtained for purposes of the investigation that are not readily available public records or otherwise in your possession.
- Request Attendance of Witnesses.
 - Any party may send a request to the Commission Assistant, at least 7 days before the Probable Cause Conference, that the hearing officer allow witnesses to participate in the Probable Cause Conference.
 - The request shall identify each witness, summarize the subject of the witness's testimony, and be sent to all parties.

Fill out the below checklist and send a copy to the Commission Assistant by email at CommAsst@fppc.ca.gov or by mail to: 1102 Q Street, Suite 3050, Sacramento, CA 95811.

2. ABOUT YOU

- Name:
- Case Number:
- Enforcement Attorney handling this case:
- Preferred contact method (select one): Phone: ___ Email: ___ Other: ___
- Please provide the information below for contact:
 - Phone:
 - Email:
 - Other:

- List dates over the next 4 months in which you are unavailable for a Probable Cause Conference: _____
- Preferred service of documents method (select one): Mail: ___ Email: ___ Other: ___
- Please provide the information below for service:
 - Mail:
 - Email:
 - Other:

Please check all that apply:

- I request to have a Probable Cause Conference.
- I will be appearing (select one): In-person: ___ Remote: ___
- I intend to submit a written response to the Probable Cause Report.
- I am requesting a copy of the records the Enforcement Division obtained for purposes of the investigation.
- I intend to have witnesses appear at the Probable Cause Conference. I will submit a request (separate from, and in addition to, this checklist) to the Commission Assistant at least 7 days before the Probable Cause Conference, that identifies each witness, summarizes the subject of the witness's testimony, and is sent to all parties.

Exhibit A-4

1 JAMES M. LINDSAY
Chief of Enforcement
2 MARISSA CORONA
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
Sacramento, CA 95811
4 Telephone: (279) 237-5932
5 Email: MCorona@fppc.ca.gov

6 Attorneys for Complainant

7 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

8 STATE OF CALIFORNIA

9
10 In the Matter of) FPPC No. 2018-01268
)
) EX PARTE REQUEST FOR A FINDING OF
11 STEVE GRASHA FOR MISSION) PROBABLE CAUSE AND AN ORDER THAT
SPRINGS WATER DISTRICT 2018,) AN ACCUSATION BE PREPARED AND
12 STEVE GRASHA FOR DESERT WATER) SERVED
AGENCY 2022, and STEVE GRASHA)
13) Gov. Code § 83115.5
)
14 Respondents.)

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

16 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)¹ and Regulation 18361.4,
17 Respondents Steve Grasha (“Grasha”) and Steve Grasha for Mission Springs Water District 2018 (“the
18 2018 Committee”) and Steve Grasha for Desert Water Agency 2022 (“the 2022 Committee”) were served
19 with a copy of a Report in Support of a Finding of Probable Cause (“PC Report”) in the above-entitled
20 matter.²

21 A PC Report, attached as “Exhibit A,” was part of a packet of materials, including a cover letter
22 and a memorandum describing probable cause proceedings, which were sent to Grasha individually and
23 on behalf of the 2018 Committee and the 2022 Committee on August 1, 2023 by certified mail, with return

24
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 receipt requested, and was served on August 7, 2023. A copy of the proof of service, certified mail receipts,
2 return receipt, and USPS tracking results are attached as “Exhibit B.”

3 In the cover letter dated August 1, 2023 and the attached materials, Respondents were advised that
4 they could respond in writing to the PC Report and orally present the case to the Hearing Officer at a
5 probable cause conference to be held in Sacramento. Respondents were further advised that in order to
6 have a probable cause conference they needed to make a written request for one within 21 days of the date
7 they were served with the PC Report. Additionally, Respondents were advised that if they did not request
8 a probable cause conference, such a conference would not be held and probable cause would be
9 determined based solely on the PC Report and any written response that they submitted within 21 days of
10 the date they were served with the PC Report. To date, Respondents have not submitted a written response
11 or requested a probable cause conference.

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

15 The 2018 Committee and Grasha

16 Count 1: The 2018 Committee and Grasha failed to timely file a statement of organization with the
17 Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of
18 Government Code Section 84101.

19 Count 2: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,395
20 contribution received on September 11, 2018 by the September 12, 2018 due date, in violation of
21 Government Code Section 84203.

22
23 Count 3: The 2018 Committee and Grasha failed to timely file the first pre-election campaign statement
24 for the reporting period of July 1, 2018 through September 22, 2018 by the September 27, 2018 due
25 date, in violation of Government Code Sections 84200.5 and 84200.8.

1 Count 4: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,500
2 contribution received on September 23, 2018 by the September 24, 2018 due date, in violation of
3 Government Code Section 84203.

4 Count 5: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
5 \$3,154.60 contribution received on October 17, 2018 by the October 18, 2018 due date, in violation of
6 Government Code Section 84203.

7
8 Count 6: The 2018 Committee and Grasha failed to timely file the second pre-election campaign
9 statement for the reporting period of September 23, 2018 through October 20, 2018 by the October 25,
10 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.

11
12 Count 7: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
13 \$3,154.60 contribution received on October 26, 2018 by the October 29, 2018 due date, in violation of
14 Government Code Section 84203.

15
16 Count 8: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
17 \$3,154.60 contribution received on October 30, 2018 by the October 31, 2018 due date, in violation of
18 Government Code Section 84203.

19 Count 9: The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for the
20 reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date, in
21 violation of Government Code Section 84200.

22
23 Count 10: The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for
24 the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due date, in violation
25 of Government Code Section 84200.

1 Count 11: The 2018 Committee and Grasha failed to make all campaign expenditures, totaling
2 approximately \$15,748.96, from a single designated campaign bank account, in violation of Government
3 Code Section 85201.

4 Count 12: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
5 distributed on October 5, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
6

7 Count 13: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
8 distributed on October 7, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
9

10 Count 14: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
11 distributed on October 12, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
12

13 Count 15: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
14 distributed on October 15, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
15

16 Count 16: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
17 distributed on October 26, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
18

19 Count 17: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
20 distributed on November 4, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
21

22 Grasha as a Candidate

23 Count 18: Grasha failed to timely disclose income and interests in real property on the Candidate
24 Statement of Economic Interests, in violation of Government Code Section 87302.3.
25

26 ///

27 ///

28 ///

The 2022 Committee and Grasha

1
2 Count 19: The 2022 Committee and Grasha failed to timely file a statement of organization with the
3 Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of
4 Government Code Section 84101.

5
6 Count 20: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
7 \$10,000 contribution received on or about August 31, 2022 by the due date of or about September 1,
8 2022, in violation of Government Code Section 84203.

9
10 Count 21: The 2022 Committee and Grasha failed to timely file the first pre-election campaign
11 statement for the reporting period of July 1, 2022 through September 24, 2022 by the September 29,
12 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

13
14 Count 22: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
15 \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation of
16 Government Code Section 84203.

17
18 Count 23: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
19 second \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation
20 of Government Code Section 84203.

21
22 Count 24: The 2022 Committee and Grasha failed to timely file the first pre-election campaign
23 statement for the reporting period of September 25, 2022 through October 22, 2022 by the October 27,
24 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

25
26 Count 25: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
27 \$5,000 contribution received on November 3, 2022 by the November 4, 2022 due date, in violation of
28 Government Code Section 84203.

1 Count 26: The 2022 Committee and Grasha failed to timely file a semi-annual campaign statement for
2 the reporting period of October 23, 2022 through December 31, 2022 by the January 31, 2023 due date,
3 in violation of Government Code Section 84200.

4 Count 27: The 2022 Committee and Grasha failed to include the proper advertisement disclosure on its
5 Facebook and Twitter landing pages, in violation of Government Code Section 84504.4, subdivision (b).
6

7 Count 28: The 2022 Committee and Grasha failed to provide the online platform with the required
8 information for six online platform disclosed advertisements, resulting in incorrect advertisement
9 disclosures, between September 30, 2022 and October 8, 2022, in violation of Government Code Section
10 84504.6 subdivision (b).

11
12 Count 29: The 2022 Committee and Grasha failed to provide the online platform with the required
13 information for nine online platform disclosed advertisements, resulting in incorrect advertisement
14 disclosures, between October 9, 2022 to October 27, 2022, in violation of Government Code Section
15 84504.6 subdivision (b).

16 Count 30: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
17 distributed on or about October 6, 2022, in violation of Government Code Section 84305.
18

19 Count 31: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
20 distributed on or about October 17, 2022, in violation of Government Code Section 84305.
21

22 Count 32: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
23 distributed on or about October 21, 2022, in violation of Government Code Section 84305.
24

25 Count 33: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
26 distributed on or about October 28, 2022, in violation of Government Code Section 84305.

1 Count 34: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
2 distributed on or about November 1, 2022, in violation of Government Code Section 84305.

3
4 Additionally, after finding probable cause exists, the Enforcement Division requests an order by
5 the Hearing Officer that an accusation be prepared against Grasha, the 2018 Committee and the 2022
6 Committee and served upon them.³

7 A copy of this Request was mailed via U.S. Mail to Grasha, individually and on behalf of the
8 Committees on June 13, 2024 at the last known address, as follows:

9 Steve Grasha, individually and o/b/o
10 Steve Grasha for Mission Springs Water District 2018
11 Steve Grasha for Desert Water Agency 2022
12 c/o Desert Water Agency
13 1200 S. Gene Autry Trail
14 Palm Springs, CA 92264

15 Dated: June 13, 2024

16 Respectfully Submitted,

17 **FAIR POLITICAL PRACTICES COMMISSION**

18 James M. Lindsay
19 Chief of Enforcement

20 

21 By: Marissa Corona
22 Commission Counsel
23 Enforcement Division

24
25
26 ³ Gov. Code § 11503.

Exhibit A-5

FPPC No. 2018-01268, In the matter of STEVE GRASHA FOR MISSION SPRINGS WATER DISTRICT 2018, STEVE GRASHA FOR DESERT WATER AGENCY 2022, and STEVE GRASHA

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

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
c/o Desert Water Agency
1200 S. Gene Autry Trail
Palm Springs, CA 92264

(By Personal Service) On Thursday, June 27, 2024, at approximately 9:30 a.m., I personally served:

Marissa Corona, Commission Counsel, at 1102 Q Street, Suite 3050, Sacramento, CA 95811.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document is executed at Sacramento, California, on June 27, 2024.



Sasha Linker

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3
4 In the Matter of) FPPC No. 2018-01268
5 STEVE GRASHA FOR MISSION)
6 SPRINGS WATER DISTRICT 2018,) FINDING OF PROBABLE CAUSE AND
7 STEVE GRASHA FOR DESERT WATER) ORDER TO PREPARE AND SERVE AN
8 AGENCY 2022, and STEVE GRASHA) ACCUSATION
9 Respondent.) Gov. Code § 83115.5
10)

11 By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation
12 Be Prepared and Served (“Ex Parte Request”), the Enforcement Division submitted the above-entitled
13 matter to the Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request,
14 the Enforcement Division served a Report in Support of a Finding of Probable Cause (“PC Report”) on
15 Respondents Steve Grasha (“Grasha”) and Steve Grasha for Mission Springs Water District 2018 (“the
16 2018 Committee”) and Steve Grasha for Desert Water Agency 2022 (“the 2022 Committee”) concerning
17 this matter on August 7, 2023 by certified mail, return receipt requested.

18 Accompanying the PC Report was a packet of materials that informed Respondents of their right
19 to file a written response to the PC Report and to request a probable cause conference within 21 days
20 following service of the PC Report. During the 21 days that followed service of the PC Report,
21 Respondents did not file a response. Pursuant to California Code of Regulations Title 2, section 18361.4,
22 determination of probable cause may be made solely on papers submitted when the respondent does not
23 request a probable cause conference.¹

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

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

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

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 PC Report served on Respondents Grasha, the 2018 Committee and the 2022 Committee, and
6 the Ex Parte Request in this matter alleges thirty-four violations of the Political Reform Act were
7 committed, as follows:

8
9 The 2018 Committee and Grasha

10 Count 1: The 2018 Committee and Grasha failed to timely file a statement of organization with the
11 Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of
12 Government Code Section 84101.

13 Count 2: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,395
14 contribution received on September 11, 2018 by the September 12, 2018 due date, in violation of
15 Government Code Section 84203.

16
17 Count 3: The 2018 Committee and Grasha failed to timely file the first pre-election campaign statement
18 for the reporting period of July 1, 2018 through September 22, 2018 by the September 27, 2018 due
19 date, in violation of Government Code Sections 84200.5 and 84200.8.

20
21 Count 4: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,500
22 contribution received on September 23, 2018 by the September 24, 2018 due date, in violation of
23 Government Code Section 84203.

24 ///

25
26
27 _____
28 ² Cal. Code Reg., tit. 2, § 18361.4, subd. (a).

1 Count 5: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
2 \$3,154.60 contribution received on October 17, 2018 by the October 18, 2018 due date, in violation of
3 Government Code Section 84203.

4
5 Count 6: The 2018 Committee and Grasha failed to timely file the second pre-election campaign
6 statement for the reporting period of September 23, 2018 through October 20, 2018 by the October 25,
7 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.

8
9 Count 7: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
10 \$3,154.60 contribution received on October 26, 2018 by the October 29, 2018 due date, in violation of
11 Government Code Section 84203.

12 Count 8: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a
13 \$3,154.60 contribution received on October 30, 2018 by the October 31, 2018 due date, in violation of
14 Government Code Section 84203.

15
16 Count 9: The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for the
17 reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date, in
18 violation of Government Code Section 84200.

19
20 Count 10: The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for
21 the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due date, in violation
22 of Government Code Section 84200.

23
24 Count 11: The 2018 Committee and Grasha failed to make all campaign expenditures, totaling
25 approximately \$15,748.96, from a single designated campaign bank account, in violation of Government
26 Code Section 85201.

27 ///

28 ///

1 Count 12: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
2 distributed on October 5, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

3
4 Count 13: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
5 distributed on October 7, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

6
7 Count 14: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
8 distributed on October 12, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

9
10 Count 15: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
11 distributed on October 15, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

12
13 Count 16: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
14 distributed on October 26, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

15
16 Count 17: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
17 distributed on November 4, 2018, in violation of Government Code Section 84305, subdivision (c)(1).

18 Grasha as a Candidate

19 Count 18: Grasha failed to timely disclose income and interests in real property on the Candidate
20 Statement of Economic Interests, in violation of Government Code Section 87302.3.

21 The 2022 Committee and Grasha

22 Count 19: The 2022 Committee and Grasha failed to timely file a statement of organization with the
23 Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of
24 Government Code Section 84101.

25 ///

1 Count 20: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
2 \$10,000 contribution received on or about August 31, 2022 by the due date of or about September 1,
3 2022, in violation of Government Code Section 84203.

4
5 Count 21: The 2022 Committee and Grasha failed to timely file the first pre-election campaign
6 statement for the reporting period of July 1, 2022 through September 24, 2022 by the September 29,
7 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

8
9 Count 22: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
10 \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation of
11 Government Code Section 84203.

12 Count 23: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
13 second \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation
14 of Government Code Section 84203.

15
16 Count 24: The 2022 Committee and Grasha failed to timely file the first pre-election campaign
17 statement for the reporting period of September 25, 2022 through October 22, 2022 by the October 27,
18 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

19
20 Count 25: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a
21 \$5,000 contribution received on November 3, 2022 by the November 4, 2022 due date, in violation of
22 Government Code Section 84203.

23 Count 26: The 2022 Committee and Grasha failed to timely file a semi-annual campaign statement for
24 the reporting period of October 23, 2022 through December 31, 2022 by the January 31, 2023 due date,
25 in violation of Government Code Section 84200.

26 ///

1 Count 27: The 2022 Committee and Grasha failed to include the proper advertisement disclosure on its
2 Facebook and Twitter landing pages, in violation of Government Code Section 84504.4, subdivision (b).

3
4 Count 28: The 2022 Committee and Grasha failed to provide the online platform with the required
5 information for six online platform disclosed advertisements, resulting in incorrect advertisement
6 disclosures, between September 30, 2022 and October 8, 2022, in violation of Government Code Section
7 84504.6 subdivision (b).

8 Count 29: The 2022 Committee and Grasha failed to provide the online platform with the required
9 information for nine online platform disclosed advertisements, resulting in incorrect advertisement
10 disclosures, between October 9, 2022 to October 27, 2022, in violation of Government Code Section
11 84504.6 subdivision (b).

12
13 Count 30: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
14 distributed on or about October 6, 2022, in violation of Government Code Section 84305.

15
16 Count 31: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
17 distributed on or about October 17, 2022, in violation of Government Code Section 84305.

18
19 Count 32: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
20 distributed on or about October 21, 2022, in violation of Government Code Section 84305.

21
22 Count 33: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
23 distributed on or about October 28, 2022, in violation of Government Code Section 84305.

24
25 Count 34: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing
26 distributed on or about November 1, 2022, in violation of Government Code Section 84305.

27
28 ///

1 Based on the Ex Parte Request given to me, I find that notice has been given to Grasha, the 2018
2 Committee and the 2022 Committee.³ I further find, based on the PC Report and the Ex Parte Request,
3 that there is probable cause to believe that Grasha, the 2018 Committee, and the 2022 Committee violated
4 the Political Reform Act as alleged in Counts 1-34, as identified above.

5 I therefore direct that the Enforcement Division issue an accusation against Grasha, the 2018
6 Committee and the 2022 Committee in accordance with this finding.

7 IT IS SO ORDERED.

8
9 June 19, 2024

L. Karen Harrison

10 Dated: _____

11 Hearing Officer
12 Fair Political Practices Commission
13
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26

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

Exhibit A-6

1 JAMES M. LINDSAY
Chief of Enforcement
2 MARISSA CORONA
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
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4 Sacramento, CA 95811
Telephone: (279) 237-5932
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6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission
7

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

11 In the Matter of:) FPPC No. 18/1268
12)
13 STEVE GRASHA FOR MISSION)
SPRINGS WATER DISTRICT 2018,) **ACCUSATION**
14 STEVE GRASHA FOR DESERT WATER)
AGENCY 2022, and STEVE GRASHA)
15) (Gov. Code §11503)
16 Respondents.)
17

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

20 **JURISDICTION**

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

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

1 Committee

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

4 13. This type of committee is known as a recipient committee.

5 Duty to File and Amend Statement of Organization

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

8 15. The statement is required to include the name of the committee.⁷

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

11 Mandatory Use of Single, Designated Campaign Bank Account

12 17. Upon the filing of the statement of intention pursuant to Section 85200, the individual
13 shall establish one campaign contribution account at an office of a financial institution located in the
14 state.⁹

15 18. A candidate who raises contributions of \$2,000 or more in a calendar year shall set forth
16 the name and address of the financial institution where the candidate has established a campaign
17 contribution account and the account number on the committee statement of organization.¹⁰

18 19. All contributions or loans made to the candidate, to a person on behalf of the candidate,
19 or to the candidate’s controlled committee shall be deposited in the account.¹¹

20 20. Any personal funds that will be utilized to promote the candidate's election shall be
21 deposited in the account prior to expenditure.¹²

22 21. All campaign expenditures shall be made from the account.¹³

23 ///

24 ⁵ Section 82013, subdivision (a).

25 ⁶ Section 84101.

26 ⁷ Section 84102.

27 ⁸ Section 84103, subd (a).

28 ⁹ Section 85201.

¹⁰ Section 85201, subdivision (b).

¹¹ Section 85201, subdivision (c).

¹² Section 85201, subdivision (d).

¹³ Section 85201, subdivision (e).

1 Duty to File Campaign Statements

2 22. The Act requires committees and treasurers to file campaign statements and reports at
3 specific times disclosing information regarding contributions received and expenditures made by
4 the campaign committees.¹⁴

5 23. If the filing due date for a statement or report falls on a Saturday, Sunday, or official
6 state holiday, then the filing due date shall be extended to the next regular business day.¹⁵

7 24. This extension does not apply to 24-hour contribution reports when the due date for
8 these reports falls on a Saturday, Sunday, or official state holiday immediately prior to an
9 election.¹⁶

10 Duty to File Pre-Election Campaign Statements

11 25. All candidates appearing on the ballot to be voted on at the next election, their controlled
12 committees, and committees primarily formed to support or oppose an elected officer, candidate, or
13 a measure appearing on the ballot to be voted on at the next election shall file the applicable pre-
14 election statements specified in Section 84200.8.¹⁷

15 26. Applicable pre-election campaign statements shall be filed as follows: (1) for the period
16 ending 45 days before the election, the statement shall be filed no later than 40 days before the
17 election, and (2) for the period ending 17 days before the election the statement shall be filed no later
18 than 12 days before the election.¹⁸

19 24-Hour Contribution Reports

20 27. A “late contribution” includes a contribution, including a loan, that totals in the aggregate
21 \$1,000 or more and is made to or received by a candidate or a controlled committee during the 90-
22 day period preceding the date of the election, or on the date of the election, at which the candidate is
23 to be voted on.¹⁹

26 ¹⁴ See Section 84200, *et seq.*

27 ¹⁵ Regulation 18116, subd. (a).

28 ¹⁶ Regulation 18116, subd. (b).

¹⁷ Section 84200.5, subdivision (a).

¹⁸ Section 84200.8, subdivisions (a)-(b).

¹⁹ Section 82036, subdivision (a).

1 28. Each committee that receives a late contribution shall report the late contribution within
2 24 hours of the time it is received.²⁰

3 Duty to File Semi-annual Campaign Statements

4 29. Recipient committees shall file semi-annual campaign statements each year no later than
5 July 31 for the period ending June 30, and no later than January 31 for the period ending December
6 31 if they have made contributions or independent expenditures, including payments to a slate
7 mailer organization, during the six-month period before the closing date of the statements.²¹

8 Advertisement Disclosure

9 30. An advertisement is any general or public communication that is authorized and paid for
10 by a committee for the purpose of supporting or opposing one or more candidates for elective office
11 or one or more ballot measures.²²

12 31. Any advertisement paid for by a committee must include the words “Paid for by”²³ or
13 “Ad paid for by”²⁴ followed by the name of the committee as it appears on the most recent
14 Statement of Organization filed with the Secretary of State.

15 32. An advertisement that is made via a form of electronic media that allows users to engage
16 in discourse and post content, or any other type of social media, that is paid for by a candidate
17 controlled committee established for an elective office of the controlling candidate, and that does
18 not support or oppose a ballot measure and is not paid for by an independent expenditure, must
19 include “Ad paid for by” followed by the name of the committee in a contrasting color that is easily
20 readable by the average viewer and in no less than 10-point font on the cover or header photo of the
21 committee’s profile, landing page, or similar location.²⁵

22 33. Additionally, an “online platform disclosed advertisement” is a paid electronic media
23 advertisement on an online platform made via a form of electronic media that allows users to
24 engage in discourse and post content or any other type of social media for which the committee
25 pays the online platform.²⁶

26 ²⁰ Section 84203, subdivision (a).

27 ²¹ Section 84200 (a).

28 ²² Section 84501.

²³ Section 84502, subdivision (a)(2) [2018].

²⁴ Section 84502, subdivision (a)(2) [2022].

²⁵ Section 84504.4, subdivision (b) [2022].

²⁶ Section 84504.6, subdivision (a)(2)(A)(i).

1 34. A committee that disseminates an online platform disclosed advertisement must
2 expressly notify the online platform that the advertisement is an advertisement as defined in Section
3 84501,²⁷ provide the online platform with the name of the committee as it appears on the most
4 recent Statement of Organization,²⁸ provide the online platform with the name of the candidate to
5 which the advertisement refers and the office to which the candidate is seeking election,²⁹ and
6 provide the online platform with the name and identification number of the committee that paid for
7 the advertisement.³⁰

8 Mass Mailings

9 35. “Mass mailing” means over 200 substantially similar pieces of mail.³¹

10 36. No candidate, candidate controlled committee established for an elective office for the
11 controlling candidate, or political party committee shall send a mass mailing unless the name, street
12 address, and city of the candidate or committee are shown on the outside of each piece of mail in the
13 mass mailing and on at least one of the inserts included within each piece of mail of the mailing in
14 no less than 6-point type that is in a color or print that contrasts with the background so as to be
15 easily legible.³²

16 37. A post office box may be stated in lieu of a street address if the organization’s address is
17 a matter of public record with the Secretary of State.³³

18 38. No candidate, candidate controlled committee established for an elective office for the
19 controlling candidate, or political party committee shall send a mass electronic mailing unless the
20 name of the candidate or committee is shown in the electronic mailing preceded by the words “Paid
21 for by” in at least the same size font as a majority of the text in the electronic mailing.”³⁴

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

23 39. It is the duty of a committee’s treasurer – including a candidate who is acting as the
24 committee treasurer – to ensure that the committee complies with all the requirements of the Act.³⁵

25 ²⁷ Section 84504.6, subdivision (b)(1).

26 ²⁸ Section 84504.6, subdivision (b)(2).

27 ²⁹ Section 84504.6, subdivision (b)(3).

28 ³⁰ Section 84504.6, subdivision (b)(4).

³¹ Section 82041.5.

³² Section 84305, subdivision (a).

³³ *Id.*

³⁴ Section 84305, subdivision (c)(1) and Regulation 18435.

³⁵ Sections 81004, 84100 and 84104, and Regulation 18427.

1 40. A committee’s treasurer may be held jointly and severally liable, along with the
2 candidate and committee, for violations committed by the committee.³⁶

3 Liability for Violations

4 41. Any person who violates any provision of the Act is liable for administrative penalties up
5 to \$5,000 per violation.³⁷

6 Candidate Statement of Economic Interests

7 42. Every candidate for an elective office that is designated in a conflict of interest code shall
8 file a statement of economic interests (“Candidate SEI”) disclosing their investments, business
9 positions, interests in real property, and income received during the immediately preceding 12
10 months, as enumerated in the disclosure requirements for that position.³⁸

11 43. In 2018, the conflict of interest code for the Mission Springs Water District specified that
12 members of the Board of Directors were public officials who managed public investments.

13 44. The Act required public officials who manage public investments to disclose all
14 reportable investments, interests in real property, and sources of income.³⁹

15 45. The Candidate SEI must be filed with the election official with whom the candidate’s
16 declaration of candidacy or other nomination documents to appear on the ballot are required to be
17 filed and must be filed no later than the final filing date for the declaration or nomination
18 documents.⁴⁰

18 **GENERAL FACTS**

19 The 2018 Committee Violations

20 46. According to records maintained by the Riverside County Registrar of Voters
21 (“Riverside County ROV”), on August 9, 2018, Grasha filed a statement of intention to be a
22 candidate for the Mission Springs Water District Board during the November 6, 2018 General
23 Election.

26 ³⁶ Sections 83116.5 and 91006 and Regulation 18316.6.

27 ³⁷ Sections 83116 and 83116.5.

28 ³⁸ Section 87302.3.

³⁹ Section 87200.

⁴⁰ Section 87302.3.

1 47. Grasha also filed a candidate campaign statement-short form (“Form 470”), on August
2 9, 2018, which states that a candidate does not anticipate receiving contributions or making
3 expenditures totaling \$2,000 or more during the calendar year.

4 48. According to invoices provided by Grasha, Grasha qualified as a committee on or around
5 September 16, 2018, by making two expenditures of \$950 and \$1,395.36 for advertisements
6 promoting Grasha’s candidacy.

7 49. The Committee and Grasha were required to file a statement of organization with the
8 Secretary of State within 10 days after the committee qualified but failed to do so.

9 50. Since Grasha was listed as a candidate on the November 6, 2018 election ballot, the
10 Committee and Grasha were required to file the first pre-election campaign statement with the
11 Riverside County ROV by the September 27, 2018 deadline but failed to do so.

12 51. The Committee and Grasha were required to file the second pre-election campaign
13 statement with the Riverside County ROV by the October 25, 2018 deadline but failed to do so.

14 52. The 90-day period preceding the November 6, 2018 General Election began on August 8,
15 2018.

16 53. Invoices for advertisements purchased by Grasha reveal that Grasha made several
17 contributions to the 2018 Committee within this period that required 24-hour contribution reports:

STATEMENT/REPORT	REPORTING PERIOD	DUE DATE	DATE FILED	AMOUNT
24-Hour Contribution Report	9/11/2018	9/12/2018	Not Filed	\$1,395.36
24-Hour Contribution Report	9/23/2018	9/24/2018	Not Filed	\$1,500.00
24-Hour Contribution Report	10/17/2018	10/18/2018	Not Filed	\$3,154.60
24-Hour Contribution Report	10/26/2018	10/29/2018 ⁴¹	Not Filed	\$3,154.60
24-Hour Contribution Report	10/30/2018	10/31/2018	Not Filed	\$3,154.60

18
19
20
21
22 54. The 2018 Committee and Grasha were required to file subsequent semi-annual
23 campaign statements for the reporting periods of October 21, 2018 through December 31, 2018 by
24 January 31, 2019, and January 1, 2019 through June 30, 2019 by July 31, 2019.

25 55. As of the date of this Report, the Committee and Grasha have failed to file any of the
26 outstanding 24-hour contribution reports, pre-election campaign statements, and semi-annual
27 campaign statements with the Riverside County ROV.

28 ⁴¹ October 26, 2018 fell on a Friday, so the filing deadline was the following Monday.

1 56. Upon the filing of the statement of intention ("Form 501"), Grasha was required to
2 establish one campaign bank account.

3 57. Since Grasha made contributions to the 2018 Committee of more than \$2,000, the
4 Committee and Grasha were required to report the financial institution and account number on the
5 committee's statement of organization.

6 58. Since Grasha failed to file a statement of organization, no campaign bank account was
7 disclosed.

8 59. Further, the Enforcement Division has received no evidence that any campaign bank
9 account exists for Grasha's 2018 campaign.

10 60. Records obtained by the Enforcement Division reveal that prior to the November 6, 2018
11 election, Grasha made a total of \$15,034.86 in expenditures for a variety of advertisements
12 promoting Grasha's candidacy.

13 61. Since the Committee and Grasha failed to establish a campaign bank account, all
14 campaign contributions and expenditures failed to source through one designated campaign bank
15 account.

16 62. During the 2018 election cycle, Grasha's advertisements included 600 yard signs, 10,600
17 slate card mailers, Facebook ads on four separate occasions, 5,000 postcards distributed three times,
18 and six mass emails reaching 12,000 recipients.

19 63. Most of these advertisements included advertisement disclosures, but the following mass
20 emails failed to include Grasha's name or the name of the Committee preceded by the words "Paid
21 for by":

DATE	MASS EMAILS	NUMBER SENT	DISCLOSURE
10/5/2018	Title: "Elect Steve Grasha – Mission Springs Water District"	2,000	Missing "Paid for by" and Candidate or Committee name
10/7/2018	Title: "New Leadership for Mission Springs Water District – Elect Steve Grasha, Director"	2,000	Missing "Paid for by" and Candidate or Committee name
10/12/2018	Title: "Absentee Ballots Have Arrived – Vote for Steve Grasha – Mission Springs Water District – Vote by Mail"	2,000	Missing "Paid for by" and Candidate or Committee name
10/15/2018	Title: "Steve Grasha for MSWD – We Know Him and We Trust Him with the Experience to Lead"	2,000	Missing "Paid for by" and Candidate or Committee name

10/26/2018	Title: "I Am Overwhelmed by the Support I Have Received Across the Mission Springs Water District and Dessert Hot Springs"	2,000	Missing "Paid for by" and Candidate or Committee name
11/4/2018	Title: "Nude Photo of MSWF Director ... Sparks Massive Sex Offender Raid in Desert Hot Springs Area"	2,000	Missing "Paid for by" and Candidate or Committee name

Grasha Candidate SEI Violation

64. Grasha was a candidate listed on the November 6, 2018 election ballot which required Grasha to file a Candidate SEI.

65. According to records maintained by the Riverside County ROV Grasha filed a Candidate SEI on August 9, 2018 which covered the period of August 8, 2017 through August 8, 2018.

66. Grasha was required to disclose investments, business positions, interests in real property, and income received during the preceding 12 months. Grasha reported no interests on the Candidate SEI.

67. According to records maintained by the Mission Springs Water District, on December 13, 2018, Grasha assumed office with the Mission Springs Water District Board and timely filed the Assuming Office SEI, which covered the period of December 13, 2017 through December 13, 2018.

68. On the Assuming Office SEI, Grasha reported income relating to ownership in True Fog, USA, with gross income estimated between \$10,001-\$100,000.

69. Since the two statement reporting periods overlap for the Candidate SEI and the Assuming Office SEI, the Assuming Office SEI revealed that Grasha had interests in True Fog, USA prior to August 8, 2018 and failed to report this interest on the Candidate SEI.

70. Per the Riverside County ROV, Grasha has not filed an amendment to the Candidate SEI to include the interest in True Fog, USA.

The 2022 Committee Violations

71. Grasha was a successful candidate in the November 8, 2022 General Election for Desert Water Agency, Division 1.

72. On September 6, 2022, the 2022 Committee and Grasha filed a statement of organization with the Riverside County ROV indicating the Committee had qualified on August 16, 2022.

1 73. However, according to Secretary of State (“SOS”) records, the 2022 Committee and
2 Grasha failed to file the statement of organization with the SOS and therefore did not receive a
3 committee identification number.

4 74. As of the date of this Report, no statement of organization has been filed with the
5 Secretary of State.

6 75. According to 24-hour contribution reports filed with the Riverside County ROV, the
7 Committee reported receiving four contributions as follows:

DATE RECEIVED	CONTRIBUTOR	AMOUNT	DUE DATE	DATE FILED
8/31/2022 ⁴²	Steve Grasha	\$10,000	9/1/2022	9/19/2022
10/7/2022	Steve Grasha	\$5,000	10/10/2022 ⁴³	10/19/2022
10/7/2022	Steve Grasha	\$5,000	10/10/2022 ⁴⁴	10/26/2022
11/3/2022	Steve Grasha	\$5,000	11/4/2022	11/8/2022

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9
10
11 76. Since Grasha was listed as a candidate on the November 8, 2022 election ballot, the 2022
12 Committee and Grasha were required to file the first pre-election campaign statement by September
13 29, 2022 and the second pre-election campaign statement by October 27, 2022.

14 77. According to filing officer records, the first and second pre-election statements were filed
15 on September 23, 2023

16 78. The 2022 Committee and Grasha were required to file the subsequent semi-annual
17 campaign statement for the reporting period of October 23, 2022 through December 31, 2022 by
18 January 31, 2023 but failed to do so when it filed the statement on September 14, 2023.

19 79. The Facebook Ad Library shows that Grasha paid for six Facebook ads from September
20 30, 2022 to October 8, 2022 totaling \$400 - \$499.

21 80. Each ad stated “Paid for by Steve Grasha” but was missing the name of the committee.

22 81. An additional nine Facebook ads were purchased by Grasha from October 9, 2022 to
23 October 27, 2022 totaling \$2,000 - \$2,500.

24 82. Each ad stated “Paid for by Steve Grasha” but was missing the name of the committee.

25
26 ⁴² The filed 24-hour contribution report disclosed the date the contribution was received as September 31, 2022. This
27 appears to be a typographical error because September has only 30 calendar days, the date of the filing was reported by the
28 Committee as September 1, 2022, and the report was date-stamped by the Riverside County ROV on September 19, 2022. It
appears that the date received was either August 31, 2022 or September 1, 2022, with the corresponding deadlines of either
September 1, 2022 or September 2, 2022.

⁴³ October 7, 2022 fell on a Friday, so the filing deadline was the following Monday.

⁴⁴ October 7, 2022 fell on a Friday, so the filing deadline was the following Monday.

1 83. The Committee created a Facebook and a Twitter account that also failed to include the
2 required “Paid for by” and committee name disclosures.

3 84. According to records obtained during the Enforcement Division’s investigation, Grasha
4 paid for 4,400 mailers on five separate occasions between October 6, 2022 and November 1, 2022
5 totaling \$15,257.71. Each of the following mass mailings failed to include the words “Paid for by:”

6

DATE	COST	NUMBER SENT	DISCLOSURE
10/6/2022	\$3,326.91	4,400	Missing “Paid for by”
10/17/2022	\$3,326.91	4,400	Missing “Paid for by”
10/21/2022	\$3,065.29	4,400	Missing “Paid for by”
10/28/2022	\$2,915.29	4,400	Missing “Paid for by”
11/1/2022	\$2,623.31	4,400	Missing “Paid for by”

7
8
9

10 **PROCEDURAL HISTORY**

11 85. The Enforcement Division initiated an administrative action against Steve Grasha for
12 Mission Springs Water District 2018, Steve Grasha for Desert Water Agency 2022, and Steve Grasha
13 in this matter by serving a packet containing a cover letter, a Report in Support of a Finding of Probable
14 Cause (“PC Report”), a fact sheet regarding probable cause proceedings, selected sections of the
15 Government Code regarding probable cause proceedings for the Commission, and selected regulations
16 of the Commission regarding probable cause proceedings.

17 86. Grasha was served with the PC Report, individually and on behalf of the 2018 Committee,
18 and the 2022 Committee by certified mail, return receipt requested on August 7, 2023. The information
19 contained in the PC Report packet advised Grasha, the 2018 Committee, and the 2022 Committee that
20 they had 21 days in which to request a probable cause conference, file a written response to the PC
21 Report, or both. During the 21 days that followed the service of the PC Report, Grasha, the 2018
22 Committee and the 2022 Committee did not file a response to the PC Report or request a probable
23 cause conference.

24 87. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
25 Accusation Be Prepared and Served (“Ex Parte Request”), dated June 13, 2024, the Enforcement
26 Division submitted the matter to the Hearing Officer for a determination of probable cause.
27
28

1 107. By failing to file the 24-hour contribution report by October 18, 2018, the 2018
2 Committee and Grasha violated Government Code Section 84203.

3 **Count 6**

4 **Failure to Time File Pre-Election Campaign Statement**

5 108. Complainant incorporates paragraphs 1 – 107 of this Accusation, as though completely
6 set forth here.

7 109. The 2018 Committee and Grasha had a duty to timely file a pre-election campaign
8 statement for the reporting period of September 23, 2018 through October 20, 2018 by the October
9 25, 2018 due date.

10 110. The 2018 Committee and Grasha failed to file a pre-election campaign statement for the
11 reporting period of September 23, 2018 through October 20, 2018 by the October 25, 2018 due date.

12 111. By failing to file the pre-election campaign statement by October 25, 2018, the 2018
13 Committee and Grasha violated Government Code Sections 84200.5, subdivision (a) and 84200.8,
14 subdivision (b).

15 **Count 7**

16 **Failure to Timely File 24-Hour Contribution Report**

17 112. Complainant incorporates paragraphs 1 – 111 of this Accusation, as though completely
18 set forth here.

19 113. The 2018 Committee and Grasha had a duty to timely file a 24-hour contribution report
20 for a \$3,154.60 contribution received on October 26, 2018 by the October 29, 2018 due date.

21 114. By failing to file the 24-hour contribution report by October 29, 2018, the 2018
22 Committee and Grasha violated Government Code Section 84203.

23 **Count 8**

24 **Failure to Timely File 24-Hour Contribution Report**

25 115. Complainant incorporates paragraphs 1 – 114 of this Accusation, as though completely
26 set forth here.

27 116. The 2018 Committee and Grasha had a duty to timely file a 24-hour contribution report
28 for a \$3,154.60 contribution received on October 30, 2018 by the October 31, 2018 due date.

1 117. By failing to file the 24-hour contribution report by October 31, 2018, the 2018
2 Committee and Grasha violated Government Code Section 84203.

3 **Count 9**

4 **Failure to Timely File Semi-Annual Campaign Statement**

5 118. Complainant incorporates paragraphs 1 – 117 of this Accusation, as though completely
6 set forth here.

7 119. The 2018 Committee and Grasha had a duty to timely file a semi-annual campaign
8 statement for the reporting period of October 21, 2018 through December 31, 2018 by the January
9 31, 2019 due date.

10 120. The 2018 Committee and Grasha failed to file a pre-election campaign statement for the
11 reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date.

12 121. By failing to file the pre-election campaign statement by January 31, 2019, the 2018
13 Committee and Grasha violated Government Code Section 84200.

14 **Count 10**

15 **Failure to Timely File Semi-Annual Campaign Statement**

16 122. Complainant incorporates paragraphs 1 – 121 of this Accusation, as though completely
17 set forth here.

18 123. The 2018 Committee and Grasha had a duty to timely file a semi-annual campaign
19 statement for the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due
20 date.

21 124. The 2018 Committee and Grasha failed to file a pre-election campaign statement for the
22 reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due date.

23 125. By failing to file the pre-election campaign statement by July 31, 2019, the 2018
24 Committee and Grasha violated Government Code Section 84200.

25 **Count 11**

26 **Failure to Establish a Campaign Bank Account**

27 126. Complainant incorporates paragraphs 1 – 125 of this Accusation, as though completely
28 set forth here.

1 **Count 14**

2 **Failure to Include Proper Disclosure on Mass Email**

3 138. Complainant incorporates paragraphs 1 – 137 of this Accusation, as though completely
4 set forth here.

5 139. The 2018 Committee and Grasha had a duty to include the proper disclosure on a mass
6 email distributed on October 12, 2018.

7 140. The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
8 distributed on October 12, 2018.

9 141. By failing to include the proper disclosure on a mass email distributed on October 12,
10 2018, the 2018 Committee and Grasha violated Government Code Section 84305, subdivision (c)(1).

11 **Count 15**

12 **Failure to Include Proper Disclosure on Mass Email**

13 142. Complainant incorporates paragraphs 1 – 141 of this Accusation, as though completely
14 set forth here.

15 143. The 2018 Committee and Grasha had a duty to include the proper disclosure on a mass
16 email distributed on October 15, 2018.

17 144. The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
18 distributed on October 15, 2018.

19 145. By failing to include the proper disclosure on a mass email distributed on October 15,
20 2018, the 2018 Committee and Grasha violated Government Code Section 84305, subdivision (c)(1).

21 **Count 16**

22 **Failure to Include Proper Disclosure on Mass Email**

23 146. Complainant incorporates paragraphs 1 – 145 of this Accusation, as though completely
24 set forth here.

25 147. The 2018 Committee and Grasha had a duty to include the proper disclosure on a mass
26 email distributed on October 26, 2018.

27 148. The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
28 distributed on October 26, 2018.

1 149. By failing to include the proper disclosure on a mass email distributed on October 26,
2 2018, the 2018 Committee and Grasha violated Government Code Section 84305, subdivision (c)(1).

3 **Count 17**

4 **Failure to Include Proper Disclosure on Mass Email**

5 150. Complainant incorporates paragraphs 1 – 149 of this Accusation, as though completely
6 set forth here.

7 151. The 2018 Committee and Grasha had a duty to include the proper disclosure on a mass
8 email distributed on November 4, 2018.

9 152. The 2018 Committee and Grasha failed to include the proper disclosure on a mass email
10 distributed on November 4, 2018.

11 153. By failing to include the proper disclosure on a mass email distributed on November 4,
12 2018, the 2018 Committee and Grasha violated Government Code Section 84305, subdivision (c)(1).

13 **Grasha as a Candidate**

14 **Count 18**

15 **Failure to Timely Disclose Interests on the Candidate Statement of Economic Interest**

16 154. Complainant incorporates paragraphs 1 – 153 of this Accusation, as though completely
17 set forth here.

18 155. Grasha, as a candidate on the ballot in the November 6, 2018 General Election, had a
19 duty to file a Candidate Statement of Economic Interest and disclose all reportable interests.

20 156. Grasha failed to report income from True Fog, USA on the Candidate Statement of
21 Economic Interest.

22 157. By failing to report income on the Candidate Statement of Economic Interest, Grasha
23 violated Government Code Section 87302.3.

24 **The 2022 Committee and Grasha**

25 **Count 19**

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

27 158. Complainant incorporates paragraphs 1 – 157 of this Accusation, as though completely
28 set forth here.

1 169. By failing to file the pre-election campaign statement by September 29, 2018, the 2022
2 Committee and Grasha violated Government Code Sections 84200.5, subdivision (a) and 84200.8,
3 subdivision (b).

4 **Count 22**

5 **Failure to Timely File 24-Hour Contribution Report**

6 170. Complainant incorporates paragraphs 1 – 168 of this Accusation, as though completely
7 set forth here.

8 171. The 2022 Committee and Grasha had a duty to timely file a 24-hour contribution report
9 for a \$5,000 contribution received on October 7, 2022 due on October 10, 2022.

10 172. The 2022 Committee and Grasha failed to file a 24-hour contribution report for a \$5,000
11 contribution received on October 7, 2022, by October 10, 2022.

12 173. By failing to file the 24-hour contribution report by October 10, 2022, the 2022
13 Committee and Grasha violated Government Code Section 84203.

14 **Count 23**

15 **Failure to Timely File 24-Hour Contribution Report**

16 174. Complainant incorporates paragraphs 1 – 173 of this Accusation, as though completely
17 set forth here.

18 175. The 2022 Committee and Grasha had a duty to timely file a 24-hour contribution report
19 for a second \$5,000 contribution received on October 7, 2022 due on October 10, 2022.

20 176. The 2022 Committee and Grasha failed to file a 24-hour contribution report for the
21 second \$5,000 contribution received on October 7, 2022, by October 10, 2022.

22 177. By failing to file the 24-hour contribution report by October 10, 2022, the 2022
23 Committee and Grasha violated Government Code Section 84203.

24 **Count 24**

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

26 178. Complainant incorporates paragraphs 1 – 177 of this Accusation, as though completely
27 set forth here.

1 179. The 2022 Committee and Grasha had a duty to timely file a pre-election campaign
2 statement for the reporting period of September 25, 2022 through October 22, 2022 by the October
3 27, 2022 due date.

4 180. The 2022 Committee and Grasha failed to file a pre-election campaign statement for the
5 reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due date.

6 181. By failing to file the pre-election campaign statement by October 27, 2022 the 2022
7 Committee and Grasha violated Government Code Sections 84200.5 subdivision (a) and 84200.8,
8 subdivision (b).

9 **Count 25**

10 **Failure to Timely File 24-Hour Contribution Report**

11 182. Complainant incorporates paragraphs 1 – 181 of this Accusation, as though completely
12 set forth here.

13 183. The 2022 Committee and Grasha had a duty to timely file a 24-hour contribution report
14 for a \$5,000 contribution received on November 3, 2022 due on November 4, 2022.

15 184. The 2022 Committee and Grasha failed to file a 24-hour contribution report for a \$5,000
16 contribution received on November 3, 2022 due on November 4, 2022.

17 185. By failing to file the 24-hour contribution report by November 4, 2022, the 2022
18 Committee and Grasha violated Government Code Section 84203.

19 **Count 26**

20 **Failure to Timely File Semi-Annual Campaign Statement**

21 186. Complainant incorporates paragraphs 1 – 185 of this Accusation, as though completely
22 set forth here.

23 187. The 2022 Committee and Grasha had a duty to timely file a semi-annual campaign
24 statement for the reporting period of October 23, 2022 through December 31, 2022, by the January
25 31, 2023 due date.

26 188. The 2022 Committee and Grasha failed to timely file a semi-annual campaign statement
27 for the reporting period of October 23, 2022 through December 31, 2022, by the January 31, 2023
28 due date.

1 189. By failing to file the pre-election campaign statement by January 31, 2023, the 2022
2 Committee and Grasha violated Government Code Section 84200.

3 **Count 27**

4 **Failure to Include Proper Disclosure on Social Media Page**

5 190. Complainant incorporates paragraphs 1 – 189 of this Accusation, as though completely
6 set forth here.

7 191. The 2022 Committee and Grasha had a duty to include the proper disclosure on its
8 Facebook and Twitter landing pages.

9 192. The 2022 Committee and Grasha failed to include the proper disclosure on its Facebook
10 and Twitter landing pages.

11 193. By failing to include the proper disclosure on its Facebook and Twitter landing pages,
12 the 2022 Committee and Grasha violated Government Code Section 84504.4, subdivision (b).

13 **Count 28**

14 **Failure to Provide Required Information to Online Platform for Online Platform Disclosed**

15 **Advertisements**

16 194. Complainant incorporates paragraphs 1 – 193 of this Accusation, as though completely
17 set forth here.

18 195. The 2022 Committee and Grasha had a duty to provide the online platform with the
19 required information for six online platform disclosed advertisements between September 30, 2022
20 and October 8, 2022.

21 196. The 2022 Committee and Grasha failed to provide the online platform with the required
22 information for six online platform disclosed advertisements between September 30, 2022 and
23 October 8, 2022, which resulted in incorrect advertisement disclosures on six online advertisements.

24 197. By failing to provide the online platform with the required information for six online
25 platform disclosed advertisements, the 2022 Committee and Grasha violated Government Code
26 section 84504.6, subdivision (b).

27 ///

28 ///

1 **Count 29**

2 **Failure to Provide Required Information to Online Platform for Online Platform Disclosed**

3 **Advertisements**

4 198. Complainant incorporates paragraphs 1 – 197 of this Accusation, as though completely
5 set forth here.

6 199. The 2022 Committee and Grasha had a duty to provide the online platform with the
7 required information for nine online platform disclosed advertisements between October 9, 2022 and
8 October 27 2022.

9 200. The 2022 Committee and Grasha failed to provide the online platform with the required
10 information for nine online platform disclosed advertisements between October 9, 2022 and October
11 27 2022, which resulted in incorrect advertisement disclosures on nine online advertisements.

12 201. By failing to provide the online platform with the required information for six online
13 platform disclosed advertisements, the 2022 Committee and Grasha violated Government Code
14 section 84504.6, subdivision (b).

15 **Count 30**

16 **Failure to Include Proper Disclosure on Mass Mailing**

17 202. Complainant incorporates paragraphs 1 – 201 of this Accusation, as though completely
18 set forth here.

19 203. The 2022 Committee and Grasha had a duty to include the proper disclosure on a mass
20 mailing distributed on October 6, 2022.

21 204. The 2022 Committee and Grasha failed to include the proper disclosure on a mass
22 mailing distributed on October 6, 2022.

23 205. By failing to include the proper disclosure on a mass mailing distributed on October 6,
24 2022, the 2022 Committee and Grasha violated Government Code Section 84305.

25 **Count 31**

26 **Failure to Include Proper Disclosure on Mass Mailing**

27 206. Complainant incorporates paragraphs 1 – 205 of this Accusation, as though completely
28 set forth here.

1
2 **Count 34**

3 **Failure to Include Proper Disclosure on Mass Mailing**

4 218. Complainant incorporates paragraphs 1 – 217 of this Accusation, as though completely
5 set forth here.

6 219. The 2022 Committee and Grasha had a duty to include the proper disclosure on a mass
7 mailing distributed on November 1, 2022.

8 220. The 2022 Committee and Grasha failed to include the proper disclosure on a mass
9 mailing distributed on November 1, 2022.

10 221. By failing to include the proper disclosure on a mass mailing distributed on November
11 1, 2022, the 2022 Committee and Grasha violated Government Code Section 84305.

12 **MITIGATING OR EXCULPATORY FACTORS**

13 222. Grasha’s name, face, and other identifiers appeared on several of the advertisements,
14 limiting the public harm.

15 **AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS**

16 223. Steve Grasha was a candidate twice previously, once for Palm Springs City Council,
17 and once for Coachella Valley Water District.

18 224. Grasha established campaign committees under the Act for each of these campaigns, so
19 Grasha was aware of the required filing obligations. Both of Grasha’s campaign committees for
20 these offices were administratively terminated by the Commission (FPPC Case Nos. 16/525 and
21 18/968).

22 225. Additionally, Grasha did not cooperate with the Enforcement Division during its
23 investigation of this matter.

24 226. Grasha avoided proactive phone calls by the Enforcement Division before the 2018
25 Election to gain compliance, and Grasha did not communicate with the Enforcement Division until
26 after the 2018 Election.

27 227. Grasha also refused to provide bank and committee records claiming that Grasha was
28 not required to comply.

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

- 1 17. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order the 2018 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
3 violation of the Political Reform Act alleged in **Count 16**;
- 4 18. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order the 2018 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
6 violation of the Political Reform Act alleged in **Count 17**;
- 7 19. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order Grasha to pay a monetary penalty of up to \$5,000 for the violation of the Political
9 Reform Act alleged in **Count 18**;
- 10 20. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
12 violation of the Political Reform Act alleged in **Count 19**;
- 13 21. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
15 violation of the Political Reform Act alleged in **Count 20**;
- 16 22. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
17 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
18 violation of the Political Reform Act alleged in **Count 21**;
- 19 23. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
20 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
21 violation of the Political Reform Act alleged in **Count 22**;
- 22 24. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
23 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
24 violation of the Political Reform Act alleged in **Count 23**;
- 25 25. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
26 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
27 violation of the Political Reform Act alleged in **Count 24**;
- 28

- 1 26. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
3 violation of the Political Reform Act alleged in **Count 25**;
- 4 27. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
5 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
6 violation of the Political Reform Act alleged in **Count 26**;
- 7 28. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
8 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
9 violation of the Political Reform Act alleged in **Count 27**;
- 10 29. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
11 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
12 violation of the Political Reform Act alleged in **Count 28**;
- 13 30. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
14 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
15 violation of the Political Reform Act alleged in **Count 29**;
- 16 31. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
17 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
18 violation of the Political Reform Act alleged in **Count 30**;
- 19 32. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
20 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
21 violation of the Political Reform Act alleged in **Count 31**;
- 22 33. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
23 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
24 violation of the Political Reform Act alleged in **Count 32**;
- 25 34. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
26 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
27 violation of the Political Reform Act alleged in **Count 33**;
- 28

- 1 35. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),
2 order the 2022 Committee and Grasha to pay a monetary penalty of up to \$5,000 for the
3 violation of the Political Reform Act alleged in **Count 34**;
- 4 36. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b),
5 order the 2018 Committee, the 2020 Committee, and Grasha to file all required statements
6 and reports.
- 7 37. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision
8 (e), consider the following factors in framing a proposed order following a finding of a
9 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
10 by the specific violation; (2) The level of experience of the violator with the requirements
11 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
12 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
13 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
14 violator demonstrated good faith by consulting the Commission staff or any other
15 governmental agency in a manner not constituting complete defense under Government
16 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
17 whether the violator has a prior record of violations of the Political Reform Act or similar
18 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
19 amendments to provide full disclosure.
- 20 38. That the Fair Political Practices Commission grant such other and further relief as it deems
21 just and proper.

22
23 Dated: 6-28-24

James M. Lindsay

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

Exhibit A-7

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 07/01/2024, I served the following document(s):

1. Statement to Respondent;
2. FPPC Case No. 18/1268: Accusation;
3. Notice of Defense for Steve Grasha for Mission Springs Water District 2018 (Two Copies);
4. Notice of Defense for Steve Grasha (Two Copies);
5. Notice of Defense for Steve Grasha for Desert Water Agency 2022 (Two Copies);
6. Selected Sections of the California Government Code, Administrative Procedure Act.

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

By personal service. At 5:50 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.

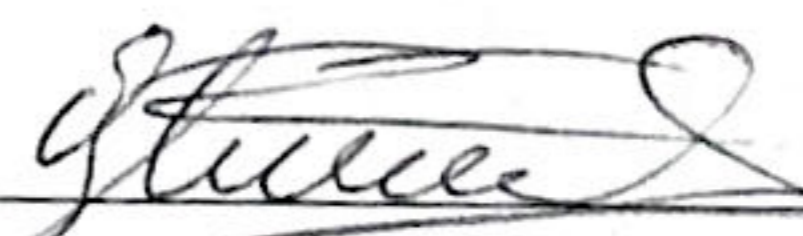
By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

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

Steve Grasha, individually an o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
1200 S Gene Autry Trail
Palm Springs, CA 92264

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 07/01/2024.



Suzanna Gevorkyan

RETURN OF SERVICE

Statement to Respondent and FPPC Case No. 18/1268: Accusation, Notice of Defense for Steve Grasha for Mission Springs Water District 2018 (Two Copies), Notice of Defense for Steve Grasha (Two Copies), Notice of Defense for Steve Grasha for Desert Water Agency 2022 (Two Copies), Selected Sections of the California Government Code, Administrative Procedure Act

Case Number: 18/1268

In the Matter of: **STEVE GRASHA FOR MISSION SPRINGS WATER DISTRICT 2018, STEVE GRASHA FOR DESERT WATER AGENCY 2022 and STEVE GRASHA**

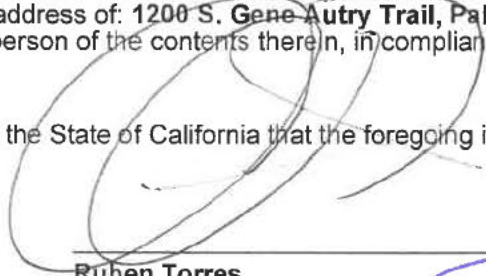
For:
James M Lindsay
Chief of Enforcement
1102 "Q" Street, Ste. 3050
Sacramento, CA 95811

Received by Ruben Torres on the 1st day of July, 2024 at 5:50 pm to be served on **Steve Grasha, 1200 S. Gene Autry Trail, Palm Springs, Riverside County, CA 92264.**

I, Ruben Torres, do hereby affirm that on the **16th day of July, 2024 at 8:00 am, I:**

INDIVIDUALLY/PERSONALLY served by delivering a true copy of the **Statement to Respondent and FPPC Case No. 18/1268: Accusation, Notice of Defense for Steve Grasha for Mission Springs Water District 2018 (Two Copies), Notice of Defense for Steve Grasha (Two Copies), Notice of Defense for Steve Grasha for Desert Water Agency 2022 (Two Copies), Selected Sections of the California Government Code, Administrative Procedure Act** with the date and hour of service endorsed thereon by me, to: **Steve Grasha** at the address of: **1200 S. Gene Autry Trail, Palm Springs, Riverside County, CA 92264**, and informed said person of the contents therein, in compliance with state statutes.

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



Ruben Torres
RPS-318 Exp 2/27/2026

July 16, 2024

Date

Ruben's Attorney Service
1775 E. Palm Canyon Drive
Ste. 110-159
Palm Springs, CA 92264
(760) 218-0088

Our Job Serial Number: RBN-2024000376
Service Fee: \$144.25

Exhibit A-8



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

STATEMENT TO RESPONDENT

[Government Code Section 11505, subdivision (b)]

***Steve Grasha for Mission Springs Water District 2018, Steve Grasha for Desert Water Agency
2022 and Steve Grasha
FPPC Case No. 18/1268***

Enclosed is an Accusation, which was filed with the Fair Political Practices Commission (the “FPPC”) and which is hereby served upon you, along with two copies of a Notice of Defense and Government Code Sections 11506 through 11508.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the FPPC within 15 days after the Accusation was served on you, the FPPC may proceed upon the Accusation without a hearing. The request for a hearing may be made by delivering or mailing the enclosed form entitled Notice of Defense, or by delivering or mailing a notice of defense as provided by Section 11506 of the Government Code to the Commission Assistant at the FPPC.

You may, but need not, be represented by counsel at any or all stages of these proceedings.

If you desire a list of the names and addresses of witnesses against you, or an opportunity to inspect and copy the items mentioned in Section 11507.6 of the Government Code that are in the possession, custody, or control of this agency, or if you wish to discuss the possibility of resolving this matter without a formal hearing, you may contact Marissa Corona, Commission Counsel, Enforcement Division, at (279) 237-5932 or at mcorona@fppc.ca.gov.

The hearing may be postponed for good cause. If you have good cause, you are obliged to notify the FPPC or, if an administrative law judge has been assigned to the hearing, the Office of Administrative Hearings, within 10 working days after you discover the good cause. Failure to give notice within 10 days will deprive you of a postponement.

After a hearing, the FPPC will consider the following factors in determining whether to assess a penalty (Title 2, California Code of Regulations, Section 18361.5, subdivision (e)):

1. The extent and gravity of the public harm caused by the specific violation;
2. The level of experience of the violator with the requirements of the Political Reform Act;
3. Penalties previously imposed by the Commission in comparable cases;
4. The presence or absence of any intention to conceal, deceive or mislead;
5. Whether the violation was deliberate, negligent or inadvertent;
6. Whether the violator demonstrated good faith by consulting the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b);
7. Whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and

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

Exhibit A-9

Exhibit A-10

**Officeholder and Candidate
Campaign Statement -
Short Form**

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

Amendment (Explain Below)

Date Stamp

CALIFORNIA FORM 470
For Official Use Only

1. Statement Covers Calendar Year 20 ____ .

2. Officeholder or Candidate Information

NAME OF OFFICEHOLDER OR CANDIDATE
STEVE GRASHA

STREET ADDRESS
Box 580 460 NPS 92258

CITY STATE ZIP CODE
760 676-6801

AREA CODE/DAYTIME PHONE NUMBER OPTIONAL: FAX / E-MAIL ADDRESS

3. Office Sought or Held

OFFICE SOUGHT OR HELD

JURISDICTION (LOCATION) DISTRICT NUMBER (IF APPLICABLE)

4. Committee Information

List all committees of which you have knowledge that are primarily formed to receive contributions or to make expenditures on behalf of your candidacy.

COMMITTEE NAME AND I.D. NUMBER	COMMITTEE ADDRESS	NAME OF TREASURER

5. Verification

I declare under penalty of perjury that to the best of my knowledge I anticipate that I will receive less than \$2,000 and that I will spend less than \$2,000 during the calendar year and that I have used all reasonable diligence in preparing this statement. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/9/18 DATE

By [Signature] SIGNATURE OF OFFICEHOLDER OR CANDIDATE

Clear Form Print Form

Exhibit A-11

COGS SOUTH INVOICE

9/11/18

**760)676-6801
The Committee to Elect
STEVE GRASHA
For MSWD**

As Requested,
California Outdoor Graphic Service South. . . COGS South, in consultation with the
Campaign, will design, silkscreen and make available to the Campaign . . .

COGS STREET SIGNS, 15" x 44" screened on COGS South's
exclusive stormproof polyboard in 2 colors, assembled as 2-sided signs
& made available for distribution. . .

400 Faces (200 2-sided signs on wood or wire frames) \$ 1,395.36

To Start Order, please approve art & invoice by fax or e-mail & send 50% deposit,
balance is due upon receipt/release of signs. Taxes are included in above figures.

Thank You,

Reed Rothrock
COGS South Signs
3309 S. Main St.
Santa Ana, CA 92707
ph#: 714.557.4779
fax: 714.557.4579

STEVEN ALLEN GRASHA

1214

DATE

9/16/2018

PAY TO THE ORDER OF

Cogs

\$ 1395, ³⁶/₁₀₀

THIRTEEN HUNDRED AND NINETY FIVE ³⁶/₁₀₀

DOLLARS



Security Features included. Details on Back.

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

GRASHA / MSWD

[Handwritten Signature]

MP

IMPACT SIGNAGE INVOICE

9/11/18

**760)676-6801
The Committee to Elect
STEVE GRASHA
For MSWD**

IMPACT SIGNAGE will post prominently and intelligently in major population centers and along principal thoroughfares as directed by the Campaign & will promptly remove after the election. . .

STREET SIGNS (2-sided), 15" x 44" or 22" x 30" , provided by the campaign . . .

200 signs posted in 1 increment \$ 950.00

Terms are 50% up-front with balance due upon posting first increment of signs .

Thank you,
IMPACT SIGNAGE
3313 S. Main St. #526
Santa Ana, CA 92707
ph: (323)481-0517

STEVEN ALLEN GRASHA

1215



DATE 9/16/2018

PAY TO THE ORDER OF

IMPACT SINGE

\$ 950,00

WINE HUNDRED FIFTY AND 00/100

DOLLARS



Security Features Included. Details on Back.

CHASE



JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

GRASHA / mswp

[Signature]

MP



Exhibit A-12

**Statement of Organization
Recipient Committee**

Statement Type

<input checked="" type="checkbox"/> Initial	<input type="checkbox"/> Amendment	<input type="checkbox"/> Termination – See Part 5
<input type="radio"/> Not yet qualified or <input checked="" type="radio"/> Date qualification threshold met	Date qualification threshold met	Date of termination
09 / 15 / 2018	_____ / _____ / _____	_____ / _____ / _____

1467900

R
33
L

Date Stamp	CALIFORNIA FORM 410
DIGITALLY RECEIVED AND FILED in the office of the California Secretary of State MAR 13 2024	For Official Use Only 2024 MAR 21 AM 7:24 REGISTRAR OF VOTERS COUNTY OF RIVERSIDE JM

1. Committee Information	I.D. Number <small>(if applicable)</small>	2. Treasurer and Other Principal Officers
NAME OF COMMITTEE Steve Grasha for Water Board 2018		NAME OF TREASURER Steve Grasha
STREET ADDRESS (NO P.O. BOX) [REDACTED]		STREET ADDRESS (NO P.O. BOX) CITY STATE ZIP CODE [REDACTED] Desert Hot Springs CA 92258
CITY STATE ZIP CODE AREA CODE/PHONE Desert Hot Springs CA 92258 [REDACTED]		EMAIL ADDRESS OF TREASURER (REQUIRED) AREA CODE/PHONE [REDACTED] [REDACTED]
FULL MAILING ADDRESS (IF DIFFERENT)		NAME OF ASSISTANT TREASURER, IF ANY
E-MAIL ADDRESS OF COMMITTEE (REQUIRED) / FAX (OPTIONAL) [REDACTED]		STREET ADDRESS (NO P.O. BOX) CITY STATE ZIP CODE
COUNTY OF DOMICILE Riverside	JURISDICTION WHERE COMMITTEE IS ACTIVE	EMAIL ADDRESS OF ASSISTANT TREASURER (REQUIRED) AREA CODE/PHONE
Attach additional information on appropriately labeled continuation sheets.		NAME OF PRINCIPAL OFFICER(S)
		STREET ADDRESS (NO P.O. BOX) CITY STATE ZIP CODE
		EMAIL ADDRESS OF PRINCIPAL OFFICER(S) (REQUIRED) AREA CODE/PHONE

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 03/08/2024 By [REDACTED]
DATE SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on 03/08/2024 By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

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

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

Exhibit A-13

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

COVER PAGE

Date Stamp
RECEIVED
2024 MAR 25 AM 8:05

CALIFORNIA FORM 460

Page 1 of 5
For Official Use Only

Statement covers period
from 01/01/2018
through 09/22/2018

Date of election if applicable:
(Month, Day, Year)
11/06/2018

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees – Complete Parts 1, 2, 3, and 4.

Officeholder, Candidate Controlled Committee
 State Candidate Election Committee
 Recall
(Also Complete Part 5)

General Purpose Committee
 Sponsored
 Small Contributor Committee
 Political Party/Central Committee

Primarily Formed Ballot Measure Committee
 Controlled
 Sponsored
(Also Complete Part 6)

Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

Preelection Statement
 Semi-annual Statement
 Termination Statement
(Also file a Form 410 Termination)
 Amendment (Explain below)

Quarterly Statement
 Special Odd-Year Report
 Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER
1467900

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Steve Grasha for Water Board 2018

STREET ADDRESS (NO P.O. BOX)
[REDACTED]

CITY STATE ZIP CODE AREA CODE/PHONE
Desert Hot Springs CA 92258 [REDACTED]

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

CITY STATE ZIP CODE AREA CODE/PHONE
[REDACTED]

OPTIONAL: FAX / E-MAIL ADDRESS
[REDACTED]

Treasurer(s)

NAME OF TREASURER
Steve Grasha

MAILING ADDRESS
[REDACTED]

CITY STATE ZIP CODE AREA CODE/PHONE
Desert Hot Springs CA 92258 [REDACTED]

NAME OF ASSISTANT TREASURER, IF ANY
[REDACTED]

MAILING ADDRESS
[REDACTED]

CITY STATE ZIP CODE AREA CODE/PHONE
[REDACTED]

OPTIONAL: FAX / E-MAIL ADDRESS
[REDACTED]

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge, the information on the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 03/14/2024
Date

Executed on 03/14/2024
Date

Executed on _____
Date

Executed on _____
Date

By _____
Signature of Controlling Officer

By _____
Responsible Officer of Sponsor

By _____
Signature of Component

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Exhibit A-14

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Date Stamp
RECEIVED
MAR 25 AM 8:05

Statement covers period
from 09/23/2018
through 10/20/2018

Date of election if applicable:
(Month, Day, Year) 2024
11/06/2018

Page 1 of 7
For Official Use Only

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
 - State Candidate Election Committee
 - Recall
(Also Complete Part 5)
- General Purpose Committee
 - Sponsored
 - Small Contributor Committee
 - Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
 - Controlled
 - Sponsored
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- Preelection Statement
- Semi-annual Statement
- Termination Statement
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER
1467900

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Steve Grasha for Water Board 2018

STREET ADDRESS (NO P.O. BOX)
[REDACTED]
CITY STATE ZIP CODE AREA CODE/PHONE
Desert Hot Springs CA 92258 [REDACTED]

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX
CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS
[REDACTED]

Treasurer(s)

NAME OF TREASURER
Steve Grasha
MAILING ADDRESS
[REDACTED]
CITY STATE ZIP CODE AREA CODE/PHONE
Desert Hot Springs CA 92258 [REDACTED]

NAME OF ASSISTANT TREASURER, IF ANY
MAILING ADDRESS
CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 03/14/2024
Date
Executed on 03/14/2024
Date
Executed on _____
Date
Executed on _____
Date

By _____
Signature of Controlling Officer of Sponsor
By _____
Signature of Controlling Officer of Sponsor
By _____
Signature of Controlling Officer, Candidate, State Measure Proponent
By _____
Signature of Controlling Officer, Candidate, State Measure Proponent

Exhibit A-15

COGS SOUTH INVOICE

9/11/18

760)676-6801

The Committee to Elect

STEVE GRASHA

For MSWD

As Requested,

California Outdoor Graphic Service South. . . COGS South, in consultation with the Campaign, will design, silkscreen and make available to the Campaign . . .

COGS STREET SIGNS, 15" x 44" screened on COGS South's exclusive stormproof polyboard in 2 colors, assembled as 2-sided signs & made available for distribution. . .

400 Faces (200 2-sided signs on wood or wire frames) \$ 1,395.36

To Start Order, please approve art & invoice by fax or e-mail & send 50% deposit, balance is due upon receipt/release of signs. Taxes are included in above figures.

Thank You,

Reed Rothrock
COGS South Signs
3309 S. Main St.
Santa Ana, CA 92707
ph#: 714.557.4779
fax: 714.557.4579

STEVEN ALLEN GRASHA

1214

DATE 9/16/2018

PAY TO THE ORDER OF

Cogs

\$ 1395, ³⁶/₁₀₀

THIRTEEN HUNDRED AND NINETY FIVE ³⁶/₁₀₀

DOLLARS  Security Features included. Details on Back.

CHASE 

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO GRASHA / MSWD

[Handwritten Signature]

MP



LANDSLIDE COMMUNICATIONS

SLATE CARD AGREEMENT and INVOICE

This Agreement is between **Landslide Communications, Inc.**, a California corporation that serves as the agent for several slate mailer organizations, including the National Tax Limitation Committee Newsletter, Save Proposition 13, "Taxifornia" Tax Fighters Guide Voter Guide, Women's Voice, California Public Safety Voter Guide, and Inland Empire Republican Leadership Voter Guide pursuant to California Government Code section 82048.4 ("Slate"), and **Steve Grasha for Mission Springs Water District** (collectively referred to as "Committee").

WHEREAS, Slate is in the business of preparing and distributing slate cards designed to inform and influence voters; and

WHEREAS, Committee would like to communicate with voters in connection with the November 2018 General election for **Mission Springs Water District**.

THEREFORE, Slate and Committee agree as follows:

1. Services.

A. Slate Cards. Slate agrees to include Committee's message on Slate's slate cards, which it will distribute throughout the district in connection with the November 2018 election. Slate agrees to distribute, by mail, no fewer than 10,600 slate cards, with Slate determining how many of each type of slate card to distribute, to district registered voters, in accordance with the time deadlines established below.

Slate's slate cards shall include a photograph and ten words of explanatory text for each candidate setting forth Committee's message and such other information regarding Committee which Slate and Committee agree to include in the slate cards.

B. Information/Proofs Provided by Slate. Slate shall provide the general parameters, including but not limited to (1) the number and width of copy lines; (2) the space dimension(s); (3) the number of colors to be used in the slate card; and (4) any text enhancements such as underlining, bolding or other enhancements that will be available for Committee's use. Slate shall provide camera ready copy for all pre-printed material to Committee for Committee's approval so Committee will know exactly how Committee's text and graphics will appear. Slate shall provide to Committee for its approval final copy on all laser variable text. Committee shall have 24 hours from receipt of camera ready and/or variable text to alter, reject or accept the proposed copy

and layout. Slate may only use copy and layout approved by Committee in writing or by electronic transmission.

C. Copy Provided by Committee. Committee shall provide copy to be used by Slate on slate cards.

D. Decision-Making Authority. Although Slate shall retain final authority regarding the wording and length of the text and the placement of Committee's message and/or explanatory text in the slate cards, Committee shall have the right to approve (or disapprove) of same prior to Slate's finalization of the slate cards for printing, such approval not to be unreasonably withheld by Committee.

E. Date of Mailing. When distributing election-related slate cards, Slate shall deliver, with proper postage paid, all copies of the slate cards to the United States Post Office no later than midnight on the Thursday before the election. When distributing absentee ballot slate cards, Slate shall deliver all copies of the slate cards to the United States Post Office no later than one week before the deadline for voters to request an absentee ballot from the Registrar of Voters. In the event that Slate fails to deliver, with proper postage paid, all slate cards to the United States Post Office before such deadlines, Committee shall be entitled to a refund of an amount equal to the percentage of slate cards not mailed on a timely basis, multiplied by the total amount of fees referenced in Section 2, below.

F. Proof of Mailing. Slate shall provide to Committee proof, in the form of Postal Service records, of the number of slate cards which were delivered to the United States Post Office by the deadlines described above, no later than November 20, 2018.

2. Fees. Committee agrees to pay Slate a total of \$1,500 (or \$250 per slate card) for the services described in this Agreement.

Slate works closely with certain independent "strategic partners", to build the third-party credibility of our slates for candidate advertisers. Rarely, a "strategic partner" will actually endorse a candidate different from the one advertising on our slates. If that happens under this agreement, the affected slate (as identified in the first paragraph of this agreement) and its portion of the total "count" and directly related fees drop out from this agreement, with no recourse for Committee, and no affect on the balance of the count and fees otherwise due slate under agreement, and the obligation to perform on the balance of the slates by slate.

3. Campaign Reporting. Committee understands and acknowledges that, under the state's campaign laws, Slate must file public reports with the Secretary of State and/or local filing officers disclosing all of its receipts and expenditures, and that Committee's name, address, and amounts paid under this Agreement will appear on these public reports. Committee further understands and acknowledges that, under the state's campaign laws, the slate cards must indicate that Committee paid Slate to be included in the slate cards.

4. General Provisions.

A. Dispute Resolution. All disputes over the terms of this Agreement or costs incurred hereunder that are not resolved in a reasonable time by the parties shall be submitted to, and settled by, an arbitrator agreeable to the parties pursuant to Title 9 of the California Code of Civil Procedure (section 1280 et seq.). Such arbitration shall be binding on the parties. The prevailing party in said arbitration proceeding shall be entitled to have and recover from the losing party reasonable attorneys' fees and costs of arbitration, including those provided by statute.

B. Confidentiality. Except as provided for in Section 3, above, Slate and Committee shall hold all information received or exchanged in connection with this Agreement in strict confidence and shall use this information only in connection with this Agreement. Slate and Committee shall also ensure that any person granted access to information received or exchanged in connection with this Agreement holds it in strict confidence.

C. Entire Agreement. This Agreement represents the full agreement of the parties, and except where expressly stated, represents the total expression and integration of the parties' intent. This Agreement shall only be modified by the mutual consent of the parties in writing.

Executed as of _____, 2018.

Landslide Communications, Inc.

**Steve Grasha for Mission Springs
Water District**

By: _____
Jim Lacy, President

By: _____
Authorized representative

**Payments are to "Landslide
Communications" and sent to:
Landslide Communications
Attn: Jim Lacy
30011 Ivy Glenn Drive, Suite 223
Laguna Niguel, CA 92677
949-249-0213
FEIN: 27-4412541**

STEVEN ALLEN GRASHA

1218

DATE

9-23-18

PAY TO THE
ORDER OF

LANDSLIDE COMMUNICATIONS \$1500.00

ONE THOUSAND FIVE HUNDRED ~~AND NO/100~~ DOLLARS

Security Features
Included
Details on Back.

CHASE 

JPMorgan Chase Bank, N.A.
www.Chase.com



MEMO

MIS. ON SPINS UP

MP

STEVEN ALLEN GRASHA

1220

DATE

10/18/2018

PAY TO THE ORDER OF

ARROW, THOMAS ASSOCIATES \$3,145.60

Three Thousand one Hundred forty five and 60/100

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

[Handwritten Signature]

STEVEN ALLEN GRASHA

1221

DATE 10-29-18

PAY TO THE ORDER OF

Aaron, T Henness

\$6,309.20

Six Thousand Three hundred and Nine ²⁰/₁₀₀ CENTS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

[Handwritten Signature]

Exhibit A-16

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

COVER PAGE

Date Stamp	CALIFORNIA FORM 460
RECEIVED	Page <u>1</u> of <u>7</u>
2024 MAR 25 AM 8:05	For Official Use Only

Statement covers period from <u>10/21/2018</u> through <u>12/31/2018</u>	Date of election if applicable: (Month, Day, Year) <u>11/06/2018</u>
--	--

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees – Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
 - State Candidate Election Committee
 - Recall
(Also Complete Part 5)
- General Purpose Committee
 - Sponsored
 - Small Contributor Committee
 - Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
 - Controlled
(Also Complete Part 6)
 - Sponsored
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- Preelection Statement
- Semi-annual Statement
- Termination Statement
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER
1467900

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Steve Grasha for Water Board 2018

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Desert Hot Springs</u>	<u>CA</u>	<u>92258</u>	<u>[REDACTED]</u>

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

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

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Steve Grasha

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Desert Hot Springs</u>	<u>CA</u>	<u>92258</u>	<u>[REDACTED]</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

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

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 03/14/2024
Date

Executed on 03/14/2024
Date

Executed on _____
Date

Executed on _____
Date

By _____

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Exhibit A-17

**Statement of Organization
Recipient Committee**

Statement Type

<input type="checkbox"/> Initial	<input type="checkbox"/> Amendment	<input checked="" type="checkbox"/> Termination – See Part 5
<input type="radio"/> Not yet qualified or	<input type="radio"/> Date qualification threshold met	Date qualification threshold met
_____ / _____ / _____	_____ / _____ / _____	Date of termination 12 / 31 / 2018

Date Stamp

REC

2024 MAR 25 AM 8:05

CALIFORNIA FORM 410

For Official Use Only

GOVERNMENT OF CALIFORNIA
COMMISSION ON GOVERNMENTAL ORGANIZATION

1. Committee Information		I.D. Number		2. Treasurer and Other Principal Officers			
NAME OF COMMITTEE		1467900		NAME OF TREASURER			
Steve Grasha for Water Board 2018				Steve Grasha			
STREET ADDRESS (NO P.O. BOX)				STREET ADDRESS (NO P.O. BOX)		CITY STATE ZIP CODE	
[REDACTED]				[REDACTED]		Desert Hot Springs CA 92258	
CITY STATE ZIP CODE AREA CODE/PHONE				EMAIL ADDRESS OF TREASURER (REQUIRED)			
Desert Hot Springs CA 92258 [REDACTED]				[REDACTED]			
FULL MAILING ADDRESS (IF DIFFERENT)				NAME OF ASSISTANT TREASURER, IF ANY			
[REDACTED]							
E-MAIL ADDRESS OF COMMITTEE (REQUIRED) / FAX (OPTIONAL)				STREET ADDRESS (NO P.O. BOX)		CITY STATE ZIP CODE	
[REDACTED]				[REDACTED]		[REDACTED]	
COUNTY OF DOMICILE	JURISDICTION WHERE COMMITTEE IS ACTIVE			EMAIL ADDRESS OF ASSISTANT TREASURER (REQUIRED)			
Riverside				[REDACTED]			
Attach additional information on appropriately labeled continuation sheets.				NAME OF PRINCIPAL OFFICER(S)			
				STREET ADDRESS (NO P.O. BOX)		CITY STATE ZIP CODE	
				[REDACTED]		[REDACTED]	
				EMAIL ADDRESS OF PRINCIPAL OFFICER(S) (REQUIRED)			
				[REDACTED]			

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and complete.

Executed on 03/14/2024 By [REDACTED]

Executed on 03/14/2024 By [REDACTED] ASSISTANT TREASURER

Executed on _____ By _____

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

Exhibit A-18

1 JAMES M. LINDSAY
Chief of Enforcement
2 MARISSA CORONA
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5932
5 Email: mcorona@fppc.ca.gov

6 Attorneys for Complainant

7
8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

9
10 **STATE OF CALIFORNIA**

11 In the Matter of

) FPPC No.: 2018-01268

12)
13 STEVE GRASHA FOR MISSION SPRINGS
14 WATER DISTRICT 2018, STEVE GRASHA
15 FOR DESERT WATER AGENCY 2022, and
16 STEVE GRASHA

) **DECLARATION OF SPECIAL
INVESTIGATOR ANN FLAHERTY**

) (Gov. Code §§ 11506 and 11520)
)

17 Respondents.
18

19 I, Ann Flaherty, declare as follows:

- 20 1. I am a Special Investigator employed by the Fair Political Practices Commission of the State of
21 California.
- 22 2. I requested and obtained copies of committee records from Steve Grasha (“Grasha”), a
23 candidate for the Mission Springs Water District Board of Directors in the November 6, 2018
24 General Election and treasurer of the committee Steve Grasha for Mission Springs Water
25 District 2018 (“the 2018 Committee”).
- 26 3. The 2018 Committee did not timely file a statement of organization, therefore I was not able to
27 locate the designated committee bank account through the ordinary process.
28

- 1 4. A review of the 2018 Committee records revealed a bank account with Chase Bank, account
2 number ending in 2810, that appeared to be the 2018 Committee bank account.
- 3 5. On November 26, 2018 I sent Grasha a records request for all records pertaining to the Chase
4 Bank Account ending in 2810.
- 5 6. On November 28, 2018 in an interview with Grasha, Grasha stated he had concerns about the
6 confidentiality of the personal bank records he would be sending in response to the records
7 request.
- 8 7. On December 21, 2018 I subpoenaed bank records for the Chase Bank account ending in 2810
9 for the period of August 1, 2018 through November 30, 2018. I received responsive records on
10 January 9, 2019.
- 11 8. The bank statements confirmed Grasha's statement to me that the account was a personal bank
12 account.
- 13 9. The 2018 Committee qualified as a Committee on September 16, 2018, by making expenditures
14 over \$2,000. However, the bank statements showed that the account had activity pre-dating the
15 2018 Committee. The account did not appear to have been established for or designated for the
16 2018 Committee.
- 17 10. The account is held in Steven A. Grasha's name, and the checks for it bear the name Steven Allen
18 Grasha.
- 19 11. Several checks from the account had things such as "Grasha/MSWD," "Mission Springs WD",
20 and "voter list" written in the memo line.
- 21 12. A review of the bank records and invoices provided by Grasha confirmed the bank account was
22 not a designated campaign account but a personal bank account. The account included activity
23 that was personal in nature and not connected to or related to the activities of the Committee.

24 ///

25 ///

26 ///

27 ///

28 ///

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

3
4 Dated: 10/01/2024

Ann Flaherty

Ann Flaherty, Special Investigator
Fair Political Practices Commission

Exhibit A-19



JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218 - 2051

July 07, 2018 through August 06, 2018

Account Number: [REDACTED]

00041819 DRE 703 219 21918 NNNNNNNNNN 1 00000000 04 0000

STEVEN A GRASHA
[REDACTED]

CUSTOMER SERVICE INFORMATION

Web site: Chase.com
Service Center: 1-800-935-9935
Deaf and Hard of Hearing: 1-800-242-7363
Para Espanol: 1-877-312-4273
International Calls: 1-713-262-1679



CHECKING SUMMARY

Chase Total Checking

	AMOUNT
Beginning Balance	\$1,136.02
Checks Paid	-76.60
ATM & Debit Card Withdrawals	-463.40
Ending Balance	\$596.02

The monthly service fee for this account was waived as an added feature of Chase Premier Checking account.

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1260 ^	07/16	\$76.60
Total Checks Paid		\$76.60

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.

^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$1,136.02
07/16	Card Purchase 07/15 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-14.83	1,121.19
07/16	Check # 1260	-76.60	1,044.59
07/18	Card Purchase 07/18 Facebk 3Jyh1fa2A2 650-5434800 CA Card 3563	-282.32	762.27
07/24	Card Purchase 07/23 Ebay Inc. 866-779-3229 CA Card 3563	-154.00	608.27
07/25	Card Purchase 07/24 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-4.08	604.19
08/03	Card Purchase 08/02 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-8.17	596.02
	Ending Balance		\$596.02



July 07, 2018 through August 06, 2018
Account Number: [REDACTED]

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call us at 1-866-564-2262 or write us at the address on the front of this statement (non-personal accounts contact Customer Service) immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt. For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspected error
- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS: Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, you must notify the bank in writing no later than 30 days after the statement was made available to you. For more complete details, see the Account Rules and Regulations or other applicable account agreement that governs your account. Deposit products and services are offered by JPMorgan Chase Bank, N.A. Member FDIC



JPMorgan Chase Bank, N.A. Member FDIC



JPMorgan Chase Bank, N.A.
 P O Box 182051
 Columbus, OH 43218-2051

August 07, 2018 through September 07, 2018

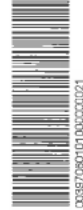
Account Number: [REDACTED]

CUSTOMER SERVICE INFORMATION

Web site: Chase.com
 Service Center: 1-800-935-9935
 Deaf and Hard of Hearing: 1-800-242-7383
 Para Espanol: 1-877-312-4273
 International Calls: 1-713-262-1679

00039706 DRE 703 219 25118 NNNNNNNNNN 1 000600000 04 0000

STEVEN A GRASHA



We updated our Deposit Account Agreement

We published an updated version of our Deposit Account Agreement on August 26, 2018. You can get the latest agreement at chase.com/disclosures, at a branch or by request when you call us. Here's what you should know:

- We may use your voice to verify your identity. (General Account Terms, Section I, Other Legal Terms, Telephone and electronic communication)
- We clarified that any provision in the agreement is enforceable to the fullest extent permitted by law. (General Account Terms, Section I, Other Legal Terms, Rules governing your account)

The following updates will become effective on November 11, 2018:

- If an account owner dies while residing outside the United States, we may require the appointment of a personal representative in a U.S. court. (General Account Terms, Section B, Checks, Withdrawals, Transfers and Other Account Charges, Death or incompetence of account owner or sole signer)
- Check deposits made by mail and addressed to any Chase facility other than National Bank by Mail, may be forwarded to the National Bank by Mail facility at PO Box 36520, Louisville, KY 40233-6520, and will be considered received on the date the deposit is received by that facility. We do not accept cash deposits by mail. (Funds Availability, When Your Deposit Is Received)

Please call us at the number at the top of this statement if you have any questions.

CHECKING SUMMARY

Chase Total Checking

	AMOUNT
Beginning Balance	\$596.02
Deposits and Additions	54,000.00
Checks Paid	-23,000.00
ATM & Debit Card Withdrawals	-21.83
Electronic Withdrawals	-255.13
Other Withdrawals	-25,000.00
Ending Balance	\$6,319.06

The monthly service fee for this account was waived as an added feature of Chase Premier Checking account.



August 07, 2018 through September 07, 2018

Account Number: [REDACTED]

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1211 ^	08/29	\$12,272.64
1212 ^	08/31	10,727.36
Total Checks Paid		\$23,000.00

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.
 ^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$596.02
08/07	Card Purchase 08/06 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-17.75	578.27
08/13	08/11 Online Payment 7394316805 To Two Springs Resort	-255.13	323.14
08/23	Deposit 1805485850	54,000.00	54,323.14
08/24	08/24 Withdrawal	-25,000.00	29,323.14
08/27	Card Purchase 08/25 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-4.08	29,319.06
08/29	Check # 1211	-12,272.64	17,046.42
08/31	Check # 1212	-10,727.36	6,319.06
	Ending Balance		\$6,319.06

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call us at 1-866-564-2262 or write us at the address on the front of this statement (non-personal accounts contact Customer Service) immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.
 For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspected error
- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS: Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, you must notify the bank in writing no later than 30 days after the statement was made available to you. For more complete details, see the Account Rules and Regulations or other applicable account agreement that governs your account. Deposit products and services are offered by JPMorgan Chase Bank, N.A. Member FDIC.



JPMorgan Chase Bank, N.A. Member FDIC



DEPOSIT

CHECKING
 SAVINGS
 CHASE LIQUID

R/T 500001020

Today's Date

8-23-18
Customer Name (Please Print)

Steven Grasha

DEPOSIT

Sign Here (If cash is received from this deposit)

X

N13060-CH (Rev 07/12) 80152135 05/16

Start your account number here



CASH ▶

CHECK ▶

TOTAL FROM OTHER SIDE ▶

SUBTOTAL ▶

CASH BACK ▶

TOTAL \$

54000.-
.
.
.
.
54000.-



HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

OFFICIAL CHECK

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

citibank
Citibank, N.A.

FC# 00289 FA# 007 \$0.00 ONL PIC DATE 06/04/18
014-02 CK. Ser.# 314536071

314536071

PAY ***FIFTY-FOUR THOUSAND DOLLARS*******

TO THE ORDER OF ***STEVEN A GRASHA******* **\$54,000.00**

NAME OF REMITTER ADDRESS TRUE FOG, USA Drawer: Citibank, N.A.

Citibank, N.A. One Penn's Way New Castle, DE 19720 BY AUTHORIZED SIGNATURE

⑈ 314536071 ⑈

Search fields on this document include:
 • Microprint Embedded in the Watermark and Visible From Reverse of Paper
 • Value may indicate alteration.

FOR INFORMATION CONCERNING THIS INSTRUMENT
 CONTACT
 800-955-5228

citibank 062367 127742 955848856787

WARNING — DO NOT CASH CHECK WITHOUT NOTING WATERMARK. HOLD TO LIGHT TO VERIFY WATERMARK.

DO NOT WRITE / SIGN / STAMP BELOW THIS LINE

DEPOSITION BANK ENDORSEMENT

X Grasha

CHASE

WITHDRAWAL

CHECKING
SAVINGS
CHASE LIQUID

F/T 500001017

WITHDRAWAL

Today's Date *8/21/19* Customer Name (Please Print) *Steve Grasho.*

If Purchasing a Cashier's Check Provide Payee Name

STEVE OR THOMAS GRASHO

NY3061-CH (REV. 10/15) 9019/01 05/18

Customer Signature

X



AMOUNT

TOTAL \$

25000.00

⑆0754137538⑆ ⑆500001017⑆

STEVEN ALLEN GRASHA
LIC. N5085218

90-7162 27742
3222

1211

DATE

8/24/18

PAY TO THE
ORDER OF

BRAD O'LYNN SANDFORD - HALL \$12,272.54

TWELVE THOUSAND TWO HUNDRED SEVENTY TWO AND 54/100 DOLLARS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

PURCHASE 115

[Signature]

⑆322271627⑆

⑆1211⑆

FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

>321177586< - 7
Redwood Credit Union - (800)479-7928
P.O. BOX 6104 SANTA ROSA, CA 95406
Teller: 135
8/27/2018 5:36 PM
DIN: 681400000080456
>321177586< - 7

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ENDORSE HERE
[Signature]



JPMorgan Chase Bank, N.A.
 P O Box 182051
 Columbus, OH 43218-2051

September 08, 2018 through October 04, 2018

Account Number: [REDACTED]

00039557 DRE 703 219 27818 NNNNNNNNNN 1 00000000 04 0000

STEVEN A GRASHA



CUSTOMER SERVICE INFORMATION

Web site: Chase.com
 Service Center: 1-800-935-9935
 Deaf and Hard of Hearing: 1-800-242-7383
 Para Espanol: 1-877-312-4273
 International Calls: 1-713-262-1679



We updated our Deposit Account Agreement

We published an updated version of our Deposit Account Agreement on August 26, 2018. You can get the latest agreement at chase.com/disclosures, at a branch or by request when you call us. Here's what you should know:

- We may use your voice to verify your identity. (General Account Terms, Section I, Other Legal Terms, Telephone and electronic communication)
- We clarified that any provision in the agreement is enforceable to the fullest extent permitted by law. (General Account Terms, Section I, Other Legal Terms, Rules governing your account)

The following updates will become effective on November 11, 2018:

- If an account owner dies while residing outside the United States, we may require the appointment of a personal representative in a U.S. court. (General Account Terms, Section B, Checks, Withdrawals, Transfers and Other Account Charges, Death or incompetence of account owner or sole signer)
- Check deposits made by mail and addressed to any Chase facility other than National Bank by Mail, may be forwarded to the National Bank by Mail facility at PO Box 36520, Louisville, KY 40233-6520, and will be considered received on the date the deposit is received by that facility. We do not accept cash deposits by mail. (Funds Availability, When Your Deposit Is Received)

Please call us at the number at the top of this statement if you have any questions.

CHECKING SUMMARY

Chase Total Checking

	AMOUNT
Beginning Balance	\$6,319.06
Deposits and Additions	18,000.00
Checks Paid	-21,144.86
ATM & Debit Card Withdrawals	-14.45
Ending Balance	\$3,159.75

The monthly service fee for this account was waived as an added feature of Chase Premier Checking account.



September 08, 2018 through October 04, 2018

Account Number: [REDACTED]

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1213 ^	09/11	\$41.00
1214 ^	09/19	1,395.36
1215 ^	09/21	950.00
1216 ^	10/01	12,000.00
1217 ^	10/02	5,223.50
1218 ^	09/26	1,500.00
1219 ^	10/02	35.00
Total Checks Paid		\$21,144.86

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.

^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$6,319.06
09/11	Check # 1213	-41.00	6,278.06
09/19	Deposit 1811206766	18,000.00	24,278.06
09/19	Check # 1214	-1,395.36	22,882.70
09/21	Check # 1215	-950.00	21,932.70
09/26	Check # 1218	-1,500.00	20,432.70
10/01	Card Purchase With Pin 10/01 Arco #42095 Ampm Desert Hot Sp CA Card 3563	-4.34	20,428.36
10/01	Check # 1216	-12,000.00	8,428.36
10/02	Card Purchase 10/01 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-10.11	8,418.25
10/02	Check # 1217	-5,223.50	3,194.75
10/02	Check # 1219	-35.00	3,159.75
	Ending Balance		\$3,159.75

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call us at 1-866-564-2262 or write us at the address on the front of this statement (non-personal accounts contact Customer Service) immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.

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- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

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JPMorgan Chase Bank, N.A. Member FDIC

STEVEN ALLEN GRASHA
LIC.N5085218

90-7162
3222 27742

1213

DATE

9/7/18

PAY TO THE ORDER OF

DMU

\$ 411.00

Four hundred and eleven and 00/100

DOLLARS



CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

Stade

MEMO

⑆32227⑆1627⑆

⑆1213

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DEPARTMENT OF MOTOR VEHICLES

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CALIFORNIA STATE TREASURER

148 BANK OF AMERICA 148

659 SEP 07 2018 05

ENDORSE HERE
412 D 9944
1036



DEPOSIT

CHECKING
 SAVINGS
 CHASE LIQUID

R/T 500001020

Today's Date

9-19-18

Customer Name (Please Print)

Steven Grasha

DEPOSIT

Sign here (X each leg received from this deposit)

X

N13065-CH (Rev. 07/12) 80196769 05/18

Start your account number here



CASH ▶

CHECK ▶

TOTAL FROM OTHER SIDE ▶

SUBTOTAL ▶

CASH BACK ▶

TOTAL \$

25.000.—
 .
 7.000.—
 18.000.—

⑈ 1811206766⑈ ⑆ 500001020 ⑆

27-Dec-18

27Dec18-1298

This is a substitute document representing a CASH OUT TICKET

Posting Date 19-Sep-18

Sequence number 008490216576

Amount 7000.00

Account Number [REDACTED]

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

CASHIER'S CHECK

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK



1145618661

Date 08/24/2018 Void after 7 years

Remitter: STEVEN A GRASHA

Pay To The Order Of: STEVE OR THOMAS GRASHA

Pay: TWENTY FIVE THOUSAND DOLLARS AND 00 CENTS

\$** 25,000.00 **

Do not write outside this box
Memo:
Note: For information only. Comment has no effect on bank's payment.

Drawn: JPMORGAN CHASE BANK, N.A.

Ryan A. Crowley, Managing Director
JPMorgan Chase Bank, N.A.
Phoenix, AZ



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STEVEN ALLEN GRASHA
LIC. N5085218

90-7162
3222 27742

1214

DATE 9/16/2018

PAY TO THE ORDER OF

COGS

\$ 1395.³⁶/₁₀₀

THIRCEEN HUNDRED AND 36/100

DOLLARS



CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com

Handwritten signature

MEMO GRASHA / MSWD

⑆322271627⑆

⑆1214

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- **Security Thread:** A continuous thread is embedded in the paper.
- **Microprint:** Tiny, repeating patterns of the number "100" are visible around the perimeter of the document.

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PAY TO THE ORDER OF
WELLS FARGO BANK
122002247
FOR DEPOSIT ONLY
C.O.G.S. SOUTH
3346284298

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HELD BY FINANCIAL INSTITUTION USE *

STEVEN ALLEN GRASHA
LIC. N5085218

90-7162
3222 27742

1215

DATE 9/16/2018

PAY TO THE
ORDER OF

IMPACT SINGE

\$ 950.⁰⁰/₁₀₀

WINE HUNDRED FIFTY AND 00/100

DOLLARS

Other features
included
back of check.

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

GRASHA / mswp

[Handwritten Signature]

⑆322271627⑆

⑆1215

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Impact Singe

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Security Features:

- **Micro-Print Line** - Results of document alteration as dotted line when photocopied
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- **Security Screen** - Absence of "Original Document" verbiage on back of check

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*** FEDERAL RESERVE BOARD OF GOVERNORS REG. CC**

STEVEN ALLEN GRASHA
LIC N5085218

90-7162
3222 27742

1218

DATE

9-23-18

PAY TO THE
ORDER OF

LANDSLIDE COMMUNICATIONS \$1500.00

ONE THOUSAND FIVE HUNDRED AND NO/100 DOLLARS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

Mission Spins EP [Signature]

3222716271

1218

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Security Features:

- MacroPrint Line
- Results of document alteration:
 - Small type in line appears as dotted line when photocopied
 - Stains or spots may appear with chemical alteration
- Security Screen
- Absence of "Original Document" verbiage on back of check

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Seq: 1
Dep: 001278.
Date: 09/26/18

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RESERVED FOR FINANCIAL INSTITUTION USE *

FOR DEPOSIT ONLY to
JAMES V-LAGY
LANDSLIDE COMMUNICATIONS, INC
Deposited By: JL

STEVEN ALLEN GRASHA
LIC. N5085218

3222 27742

1219

DATE

9/26/18

PAY TO THE
ORDER OF

Registrar of Voters

\$ 35.00

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

DOLLARS



Security Features
Protect
Check for them.

MEMO

Voter List

[Handwritten Signature]

⑆322271627⑆

1219

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PAY TO THE ORDER OF
FIDELITY BANK OF CALIFORNIA
FOR DEPOSIT ONLY
COUNTY OF RIVERSIDE
REGISTRAR OF VOTERS
91400, RENO

The security features listed below, as well as those
not listed, exceed industry guidelines.
Security Features:
• MP: Small type in line separates
document from
• MP: Small type in line separates
document from
• MP: Small type in line separates
document from
• MP: Small type in line separates
document from
• MP: Small type in line separates
document from

STEVEN ALLEN GRASHA
LIC. N5085218

90-7162
3222 27742

1217

DATE

10/1/18

\$5223.50

\$5223.50

PAY TO THE
ORDER OF

TWO STAGE
FIVE THOUSAND TWO HUNDRED THIRTY TWO

DOLLARS

CHASE

Morgan Chase Bank, N.A.
www.Chase.com

[Handwritten Signature]

MEMO

Site 162

⑆322271627⑆

1217

* FEDERAL RESERVE DUAL USE CHECKS ARE SUBJECT TO 31 U.S.C. 3221
The security features of this check are as those of the not listed, excepted and, only you can tell.
Security Features: Paper with security fibers Microprint Security Thread Security Glue Security Watermark Security Hologram Security Sensitive Paper Security Screen Security Ink Security Color Security UV Security IR Security X-ray Security Laser Security Other

Seq: 135
Batch: 184653
Date: 10/02/18

Seq: 00135 10/02/18
EAT: 104553 CC: 3189803959
WT: 01 LTPS Jacksonville PT
BC: Palm Springs Main BC CA9-

DO NOT WRITE, STAMP OR SIGN IN THESE LINES
RESERVED FOR FINANCIAL INSTITUTIONS

ACCT.

TWO SPRINGS LLC

FOR DEPOSIT ONLY

ENDORSE HERE



JPMorgan Chase Bank, N.A.
 P O Box 182051
 Columbus, OH 43218 - 2051

October 05, 2018 through November 06, 2018

Account Number: [REDACTED]

00040987 DRE 703 219 31118 NNNNNNNNNN 1 00000000 04 0000

STEVEN A GRASHA
 [REDACTED]

CUSTOMER SERVICE INFORMATION

Web site: Chase.com
 Service Center: 1-800-935-9935
 Deaf and Hard of Hearing: 1-800-242-7383
 Para Espanol: 1-877-312-4273
 International Calls: 1-713-262-1679



CHECKING SUMMARY

Chase Total Checking

	AMOUNT
Beginning Balance	\$3,159.75
Deposits and Additions	11,409.72
Checks Paid	-9,454.80
ATM & Debit Card Withdrawals	-457.61
Electronic Withdrawals	-154.62
Ending Balance	\$4,502.44

The monthly service fee for this account was waived as an added feature of Chase Premier Checking account.

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1220 ^	10/22	\$3,145.60
1221 ^	10/31	6,309.20
Total Checks Paid		\$9,454.80

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.

^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$3,159.75
10/09	Deposit 1810906559	7,000.00	10,159.75
10/09	Card Purchase 10/05 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-11.51	10,148.24
10/09	Card Purchase 10/08 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-6.77	10,141.47
10/10	Card Purchase With Pin 10/10 Windmill Market North Palm Sp CA Card 3563	-10.76	10,130.71
10/11	Card Purchase With Pin 10/11 Denny's #9261 N. Palm Sprin CA Card 3563	-7.85	10,122.86
10/11	Card Purchase With Pin 10/11 Windmill Market North Palm Sp CA Card 3563	-9.95	10,112.91



October 05, 2018 through November 05, 2018

Account Number: [REDACTED]

TRANSACTION DETAIL (continued)

DATE	DESCRIPTION	AMOUNT	BALANCE
10/12	Card Purchase 10/10 Denny's #9261 N. Palm Sprin CA Card 3563	-7.85	10,105.06
10/12	Card Purchase With Pin 10/12 Arco #42509 Ampm Desert Hot Sp CA Card 3563	-56.21	10,048.85
10/12	Card Purchase With Pin 10/12 Windmill Market North Palm Sp CA Card 3563	-11.02	10,037.83
10/15	Card Purchase 10/12 Denny's #9261 N. Palm Sprin CA Card 3563	-7.85	10,029.98
10/15	Card Purchase 10/13 Jack IN The Box 3388 North Palm Sp CA Card 3563	-5.89	10,024.09
10/15	Card Purchase With Pin 10/13 Apple Store #R297 73- Palm Desert CA Card 3563	-24.26	9,999.83
10/15	Card Purchase 10/13 Blaze Pizza Palm D Palm Desert CA Card 3563	-11.58	9,988.25
10/15	Card Purchase With Pin 10/13 Apple Store #R297 73- Palm Desert CA Card 3563	-31.25	9,957.00
10/15	Card Purchase 10/14 The Collage Too Desert Hot Sp CA Card 3563	-7.81	9,949.19
10/15	Card Purchase 10/14 Subway 000342 Desert Hot Sp CA Card 3563	-10.54	9,938.65
10/15	Card Purchase With Pin 10/15 Windmill Market North Palm Sp CA Card 3563	-11.57	9,927.08
10/16	Card Purchase 10/14 Quick Quack - 0305 Desert Hot Sp CA Card 3563	-6.99	9,920.09
10/16	Card Purchase 10/14 Mcdonald's F6633 Desert Hot Sp CA Card 3563	-3.76	9,916.33
10/16	Card Purchase With Pin 10/16 Pilot #0307 N Palm Spg CA Card 3563	-7.41	9,908.92
10/16	Card Purchase With Pin 10/16 Pilot #0307 N Palm Spg CA Card 3563	-16.38	9,892.54
10/17	Card Purchase 10/15 Denny's #9261 N. Palm Sprin CA Card 3563	-11.38	9,881.16
10/17	Card Purchase 10/16 Subway 000342 Desert Hot Sp CA Card 3563	-1.39	9,879.77
10/17	Card Purchase With Pin 10/17 Arco #42509 Ampm Desert Hot Sp CA Card 3563	-100.35	9,779.42
10/18	Deposit 1810906785	4,000.00	13,779.42
10/18	Card Purchase 10/16 Mcdonald's F6633 Desert Hot Sp CA Card 3563	-14.85	13,764.57
10/18	Card Purchase 10/17 Taco Bell 33354 Desert Hot Sp CA Card 3563	-9.25	13,755.32
10/18	Card Purchase 10/17 Taco Bell 33354 Desert Hot Sp CA Card 3563	-2.68	13,752.64
10/19	Card Purchase 10/17 Jack IN The Box 3388 North Palm Sp CA Card 3563	-5.89	13,746.75
10/19	Card Purchase 10/18 Subway 000342 Desert Hot Sp CA Card 3563	-12.85	13,733.90
10/19	10/19 Online Payment 7590812238 To Two Springs Resort	-154.62	13,579.28
10/22	Card Purchase 10/18 Jalisco Market & Deli Palm Springs CA Card 3563	-9.80	13,569.48
10/22	Card Purchase 10/18 Jalisco Market & Deli Palm Springs CA Card 3563	-10.00	13,559.48
10/22	Card Purchase 10/19 Panda Express 909 Palm Springs CA Card 3563	-11.96	13,547.52
10/22	Check # 1220	-3,145.60	10,401.92
10/31	Remote Online Deposit 1	258.73	10,660.65
10/31	Remote Online Deposit 1	128.23	10,788.88
10/31	Remote Online Deposit 1	22.76	10,811.64
10/31	Check # 1221	-6,309.20	4,502.44
	Ending Balance		\$4,502.44



October 05, 2018 through November 06, 2018

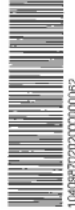
Account Number: [REDACTED]

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call us at 1-866-564-2262 or write us at the address on the front of this statement (non-personal accounts contact Customer Service) immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt. For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspected error
- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS: Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, you must notify the bank in writing no later than 30 days after the statement was made available to you. For more complete details, see the Account Rules and Regulations or other applicable account agreement that governs your account. Deposit products and services are offered by JPMorgan Chase Bank, N.A. Member FDIC



10463857020000000062



JPMorgan Chase Bank, N.A. Member FDIC



October 05, 2018 through November 06, 2018

Account Number: [REDACTED]

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CHASE

DEPOSIT

CHECKING
SAVINGS
CHASE LIQUID

R/T 500001020

DEPOSIT

Today's Date
10/09/18

Customer Name (Please Print)
Steven Grasha

Sign Here (If cash is received from this deposit) -----

X

N13080-CH (Rev. 07/12) 88196709 06/18

Start your account number here



CASH ▶
CHECK ▶
TOTAL FROM OTHER SIDE ▶
SUBTOTAL ▶
CASH BACK ▶

TOTAL \$

7000.00
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7000.00

⑆ 18 10906559⑆ ⑆ 500001020⑆

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

CASHIER'S CHECK

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK



Date 09/19/2018 Void after 7 years

1145618772

Remitter: STEVEN A GRASHA

Pay To The Order Of: STEVE OR THOMAS GRASHA

Pay: SEVEN THOUSAND DOLLARS AND 00 CENTS

\$** 7,000.00 **

Do not write outside this box
Memo:
Note: For information only. Comment has no effect on bank's payment.

Drawn: JPMORGAN CHASE BANK, N.A.

Ryan A. Crowley

Ryan A. Crowley, Managing Director
JPMorgan Chase Bank, N.A.
Phoenix, AZ



⑆ 1145618772⑆ ⑆ 22100024⑆

Security Alert: on this document include a Micro Print Embossed Line, Watermark and Visible Fibers. Absence of these features may indicate a counterfeit. For more details visit www.fraud.org

FOR INFORMATION
ACCOMPANYING THIS INSTRUMENT
CONTACT:
PHONIC CHASE BANK, N.A.
1-800-935-0556

WARNING - DO NOT CASH CHECK WITHOUT NOTING WATERMARK. HOLD TO LIGHT TO VIEW WATERMARK.
DO NOT WRITE / SIGN / STAMP BELOW THIS LINE
DEPOSIT TO YOUR ACCOUNT

1379584237

CHASE

DEPOSIT

CHECKING
SAVINGS
CHASE LIQUID

F/T 500001020

Today's Date *10/18/12*
Customer Name (Please Print) *Steven Grasha*

DEPOSIT

CASH ▶
CHECK ▶
TOTAL FROM OTHER SIDE ▶
SUBTOTAL ▶
CASH BACK ▶
TOTAL \$

4000.00
:
:
:
4000.00

Sign Here (If cash is received from this deposit)

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N13006-CH (Rev. 07/12) 80186769 06/18



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PREFERRED AUTO BROKERS
3400 WEST HAMPOEN AVE.
ENGLEWOOD, CO 80110
303-783-2122

FORTIS PRIVATE BANK
Littleton, Colorado

82-642/1070

10/8/2018

PAY TO THE ORDER OF STEVEN GRASHA

\$ **4,000.00

Four Thousand and 00/100***** DOLLARS

STEVEN GRASHA
PO 462
NILAND, CA 92267

[Handwritten Signature]
MICROWAVE SENSITIVE
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MEMO

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THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE. RED IMAGE DISAPPEARS WITH HEAT.
DO NOT WRITE, STAMP, OR SIGN BELOW THIS LINE

DO NOT WRITE, STAMP, OR SIGN BELOW THIS LINE
[Handwritten Signature]

STEVEN ALLEN GRASHA
LIC. N5085218

90-7182
3222 27742

1220

DATE

10/18/2018

PAY TO THE
ORDER OF

Arroyo, Thomas & Associates \$3,145.60

Three Thousand one Hundred forty five and 60/100

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

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1220

The security features listed below, as well as those not listed, exceed industry guidelines.

Security Features:

- Microprint Line
- Chemically Sensitive Paper
- Security Screen

 Results of document alteration:

- MP Small type in line appears as dotted line when photocopied
- Stains or spots may appear with chemical alteration
- Absence of "Original Document" verbiage on back of check

 * FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

2018 Dep:000256 Loc:17508 Cust:19907 User:9872

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE *

Deposit made to
account
R/T: 122016066

27-Dec-18

Reference Case Number: G27Dec18-1298

This is a substitute document representing an Electronic Ticket

Posting Date 31-Oct-18

Sequence Number 001790641874

Amount 258.73

Account Number: [REDACTED]

Date Request Received 27-Dec-18

State Farm 6228	STATE FARM GENERAL INSURANCE COMPANY 900 Old River Rd Bakersfield, CA 93311-9501	JPMORGAN CHASE BANK, NA COLUMBUS, OH	56-1544/141 712 505162
POLICY NUMBER 77-EA-W025-6		DATE JUL 30 2018	
IN PAYMENT OF RETURN PREM 259-00			
PAY TO THE ORDER OF		H-0724-FA41 F H	\$ *****258.73
GRASHA, STEVE PO BOX 462 NILAND CA 92257-0462		TWO HUNDRED FIFTY EIGHT DOLLARS AND 73 CENTS	
		<i>Thomas Conley</i> PRESIDENT <i>POJ Smith</i>	

⑈ 1270505162⑈ ⑆044115443⑆

For Deposit Only - JPMC

[Handwritten Signature]

This Money Order belongs to Member and Service Provider. By endorsing this payment for your services, you agree not to use or disclose any personal customer information received from Member (necessary for the services requested).

STEVEN ALLEN GRASHA
LIC N5085218

90-7162
322 27742

1221

DATE 10-29-18

PAY TO THE
ORDER OF

Aaron, Thomas

\$6,309.20

Six Thousand Three hundred and Nine ²⁰/₁₀₀ CENTS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

⑆322271627⑆

⑆1221

The security features listed below, as well as those not listed, exceed industry guidelines.
Security Features:
MicroPrint Line
Chemically Sensitive Paper
Security Screen
Results of document alterations:
MP Small type in fine appears as dotted line when photocopied
Stains or spots may appear with chemical alteration
Absence of "Original Document" markings on back of check

34/18 Dep:000274 Loc:17508 Cust:19907 User:9872

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE *

FOR DEPOSIT ONLY to
account
R/T: 122016066

27-Dec-18

Reference Case Number: G27Dec18-1298

This is a substitute document representing an Electronic Ticket

Posting Date 31-Oct-18

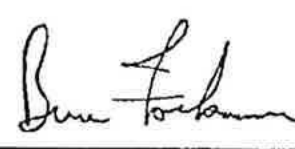
Sequence Number 005570188242

Amount 128.23

Account Number: [REDACTED]

Date Request Received 27-Dec-18

THIS WATERMARKED PAPER DOES NOT ACCEPT WITHOUT GETTING WATERMARKS (HOLD UP TO LIGHT)

SoCalGas <small>Simple Energy</small>	CHECK NUMBER	DATE	DOLLARS	CENTS
SoCalGas® PO BOX 613249 LOS ANGELES, CA 90051-1249	00603247	08/28/18	*****128.23	
PAY ***ONE HUNDRED TWENTY EIGHT DOLLARS AND TWENTY THREE CENTS***				
TO THE ORDER OF STEVE GRASHA PO BOX 462 NILAND CA 92257 - 0462				
UnionBank ACCOUNT NUMBER POWER & UTIL TREAS SVCS-US CORP BANK 117 724 5388 445 S. FIGUEROA ST. 01 8468 240 LOS ANGELES, CA 90071			 <small>CHECK VOID AFTER 6 MONTHS</small>	
CUSTOMER REFUND CHECK <small>THE BACK OF THIS DOCUMENT CONTAINS THE GAS COMPANY WATERMARKS; HOLD AT AN ANGLE TO VIEW</small>				


⑆603247⑆ ⑆122000496⑆ [REDACTED]

For Deposit Only - JPMC

TRANSIT ENDORSEMENT

DO NOT WRITE IN THIS AREA
DEPOSIT ONLY BANK ENDORSEMENT

ENDORSE HERE



27-Dec-18

Reference Case Number: G27Dec18-1298

This is a substitute document representing an Electronic Ticket

Posting Date 31-Oct-18

Sequence Number 005570191829

Amount 22.76

Account Number [REDACTED]

Date Request Received 27-Dec-18

IMPERIAL IRRIGATION DISTRICT
333 E. BARONS BLVD.
IMPERIAL, CA 92251

UNION BANK
83 CALIF. COURT, OFFICES
445 SO. FIGUEROA
LOS ANGELES, CA 90071

TELEPHONE 150335769

THIS CHECK VOID 90 DAYS
AFTER DATE OF ISSUE

TWENTY-TWO USD AND 76/100

DATE
03/02/2018

AMOUNT
\$22.76**

PAY TO THE ORDER OF: STEVE GRASSA
PO BOX 452
IMPERIAL, CA 92257

Maria Loring Calderon

⑆150335769⑆ ⑆22000496⑆

For Deposit Only - JPMC

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www.jpmorgan.com
www.fedreserve.gov
www.fdic.gov

TECHNICAL ASSISTANCE BOARD OF GOVERNORS REG. C.E.
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JPMorgan Chase Bank, N.A.
 P O Box 182051
 Columbus, OH 43218 - 2051

November 07, 2018 through December 06, 2018

Account Number: [REDACTED]

00039023 DRE 703 219 34118 NNNNNNNNNN 1 00000000 04 0000

STEVEN A GRASHA



CUSTOMER SERVICE INFORMATION

Web site: Chase.com
 Service Center: 1-800-935-9935
 Deaf and Hard of Hearing: 1-800-242-7383
 Para Espanol: 1-877-312-4273
 International Calls: 1-713-262-1679



We updated our Deposit Account and Wire Transfer Agreements

The following changes were made November 11, 2018:

- We published an updated version of our Deposit Account Agreement. You can get the latest agreement at chase.com/disclosures, at a branch or by request when you call us. Here's what you should know:
 - We added a section to describe our new Autosave feature, which allows you to make automatic transfers from your checking account to your savings account. (New section in General Account Terms, Section B, Autosave feature)
 - We no longer charge an Extended Overdraft Fee. (General Account Terms, Section C, Insufficient Funds and Returned Item fees)
 - We added an address for reporting a dispute if you believe we provided incomplete or inaccurate information about your account to a consumer reporting agency. (New section in General Account Terms, Section I, Disputing information reported to a consumer reporting agency)
- We updated our Wire Transfer Agreement, here's what you should know:
 - You will still receive email notifications on the status of your wire transfer. However, we added that if we're unable to send an email due to system failures or outages, it's your responsibility to monitor your account for the status of your wire transfer.
 - We clarified that you should expect your foreign exchange rate to be less favorable than rates quoted online or in publications.

Please call us at the number at the top of this statement if you have any questions.

We want to remind you about the overdraft service options that are available for your personal checking account(s)

We've included information on the last page of this statement to remind you about our overdraft services and associated fees. You can find more information about these services and ways to avoid overdraft fees at chase.com/overdraft-services.

If you have questions, please call us anytime at the number on your statement.



November 07, 2018 through December 06, 2018

Account Number: [REDACTED]

CHECKING SUMMARY Chase Total Checking

	AMOUNT
Beginning Balance	\$4,502.44
ATM & Debit Card Withdrawals	-1,736.23
Electronic Withdrawals	-1,246.16
Ending Balance	\$1,520.05

The monthly service fee for this account was waived as an added feature of Chase Premier Checking account.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$4,502.44
11/13	ATM Withdrawal 11/11 2465 E Palm Canyon DR Palm Springs CA Card 3563	-20.00	4,482.44
11/13	11/12 Online Transfer 7658718600 To Citibank / Truefog, USA #####1025 Transaction #: 7658718600	-1,200.00	3,282.44
11/13	Card Purchase With Pin 11/12 Pilot #0307 N Palm Spg CA Card 3563	-256.72	3,025.72
11/13	Card Purchase 11/12 Panera Bread #601356 Palm Springs CA Card 3563	-18.23	3,007.49
11/13	Card Purchase With Pin 11/12 Arco #42509 Ampm Desert Hot Sp CA Card 3563	-47.02	2,960.47
11/13	Card Purchase With Pin 11/13 Pilot #0307 N Palm Spg CA Card 3563	-14.19	2,946.28
11/13	Card Purchase With Pin 11/13 Pilot #0307 N Palm Spg CA Card 3563	-5.45	2,940.83
11/14	Card Purchase 11/13 Del Taco 1092 Palm Springs CA Card 3563	-9.17	2,931.66
11/14	Card Purchase With Pin 11/14 Pilot #0307 N Palm Spg CA Card 3563	-5.45	2,926.21
11/19	Card Purchase 11/15 Mcdonald's F6633 Desert Hot Sp CA Card 3563	-6.99	2,919.22
11/19	Card Purchase 11/15 Jack IN The Box 3388 North Palm Sp CA Card 3563	-5.21	2,914.01
11/19	Card Purchase 11/16 Taco Bell 33354 Desert Hot Sp CA Card 3563	-7.21	2,906.80
11/19	Card Purchase 11/18 Subway 000342 Desert Hot Sp CA Card 3563	-8.39	2,898.41
11/19	Card Purchase 11/17 Mcdonald's F6633 Desert Hot Sp CA Card 3563	-3.76	2,894.65
11/19	Card Purchase With Pin 11/19 7-Eleven Desert Hot Sp CA Card 3563	-5.77	2,888.88
11/20	Card Purchase 11/16 State of Calif Dmv Int 800-7770133 CA Card 3563	-138.00	2,750.88
11/20	Card Purchase 11/18 Jack IN The Box 3388 North Palm Sp CA Card 3563	-5.89	2,744.99
11/20	Card Purchase 11/18 Del Taco 0413 Desert Hot Sp CA Card 3563	-8.50	2,736.49
11/20	Card Purchase 11/19 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-8.17	2,728.32
11/20	Card Purchase 11/19 Taco Bell 33354 Desert Hot Sp CA Card 3563	-6.43	2,721.89
11/20	Card Purchase With Pin 11/20 Arco #42509 Ampm Desert Hot Sp CA Card 3563	-44.18	2,677.71
11/21	Card Purchase 11/20 Airport Quick Wash Palm Springs CA Card 3563	-19.99	2,657.72
11/21	Card Purchase 11/20 Castanedas Paseo Palm Springs CA Card 3563	-10.33	2,647.39
11/21	Card Purchase 11/20 Staples 001138 Cathedral Ctl CA Card 3563	-3.81	2,643.58
11/21	Card Purchase 11/20 Carl's Jr #1100730 Desert Hot Sp CA Card 3563	-11.18	2,632.40
11/21	11/21 Online Payment 7685249392 To Two Springs Resort	-46.16	2,586.24
11/23	Card Purchase 11/21 State of Calif Dmv Int 800-7770133 CA Card 3563	-139.00	2,447.24
11/23	Card Purchase 11/21 Mcdonald's F6633 Desert Hot Sp CA Card 3563	-6.99	2,440.25



November 07, 2018 through December 06, 2018

Account Number: [REDACTED]

TRANSACTION DETAIL (continued)

DATE	DESCRIPTION	AMOUNT	BALANCE
12/03	Card Purchase With Pin 12/02 Vons Store 2177 Desert Hot Sp CA Card 3563	-25.81	1,644.54
12/04	Card Purchase 12/02 Mcdonald's F6633 Desert Hot Sp CA Card 3563	-8.38	1,636.16
12/04	Card Purchase 12/02 Jack IN The Box 3388 North Palm Sp CA Card 3563	-6.29	1,629.87
12/04	Card Purchase Card 3563 12/03 Des Reg Med CT6006324 Palm Springs CA	-3.05	1,626.82
12/04	Card Purchase Card 3563 12/03 Des Reg Med CT6006324 Palm Springs CA	-3.05	1,623.77
12/04	Card Purchase 12/04 Billy Reeds Restauran Palm Springs CA Card 3563	-23.70	1,600.07
12/04	Card Purchase With Pin 12/04 Builders Supply Desert Hot Sp CA Card 3563	-3.54	1,596.53
12/04	Card Purchase With Pin 12/04 Albertsons Store 156 Palm Springs CA Card 3563	-20.72	1,575.81
12/05	Card Purchase 12/04 Panda Express 909 Palm Springs CA Card 3563	-11.47	1,564.34
12/05	Card Purchase With Pin 12/05 Arco #42509 Ampm Desert Hot Sp CA Card 3563	-34.59	1,529.75
12/06	Card Purchase Card 3563 12/05 Des Reg Med CT6006324 Palm Springs CA	-9.70	1,520.05
Ending Balance			\$1,520.05

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call us at 1-866-564-2262 or write us at the address on the front of this statement (non-personal accounts contact Customer Service) immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.
 For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspected error
- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS: Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, you must notify the bank in writing no later than 30 days after the statement was made available to you. For more complete details, see the Account Rules and Regulations or other applicable account agreement that governs your account. Deposit products and services are offered by JPMorgan Chase Bank, N.A. Member FDIC



JPMorgan Chase Bank, N.A. Member FDIC



November 07, 2018 through December 06, 2018

Account Number: [REDACTED]

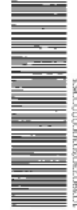
Overdraft and Overdraft Fee Information for Your Chase Checking Account

What You Need to Know About Overdrafts and Overdraft Fees

An overdraft occurs when you do not have enough money in your account to cover a transaction, but we pay it anyway. We can cover your overdrafts in two different ways:

1. We have standard overdraft practices that come with your account.
2. We also offer overdraft protection through a link to a Chase savings account, which may be less expensive than our standard overdraft practices. You can contact us to learn more.

This notice explains our standard overdraft practices.



- **What are the standard overdraft practices that come with my account?**

We do authorize and pay overdrafts for the following types of transactions:

- Checks and other transactions made using your checking account number
- Recurring debit card transactions

We do not authorize and pay overdrafts for the following types of transactions, unless you ask us to (see below):

- Everyday debit card transactions

We pay overdrafts at our discretion, which means we do not guarantee that we will always authorize and pay any type of transaction. If we do not authorize and pay an overdraft, your transaction will be declined.

- **What fees will I be charged if Chase pays my overdraft?**

Under our standard overdraft practices:

- If we pay an item, we'll charge you a \$34 Insufficient Funds Fee per item. This fee is not charged if your account balance at the end of the business day is overdrawn by \$5 or less, or for items that are \$5 or less.
- We won't charge more than three Insufficient Funds Fees per day, for a total of \$102.

- **We waive fees for some account types:**

- For Chase SapphireSM Checking accounts, we waive the Insufficient Funds and Returned Item fees if you've had four or fewer Insufficient Funds or Returned Item occurrences in the past 12 months.
- For Chase Private Client CheckingSM accounts, we waive the Chase overdraft fees.

- **What if I want Chase to authorize and pay overdrafts on my everyday debit card transactions?**

If you or a joint account owner would like to change your selection, sign in to chase.com to update your account settings, or call us anytime at 1-800-935-9935 (or collect at 1-713-262-1679 if outside the U.S.), or visit a Chase branch.



November 07, 2018 through December 06, 2018
Account Number: [REDACTED]

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Personal Signature Card

ACCOUNT TITLE
STEVEN A GRASHA



ACCOUNT NUMBER
TAX RESPONSIBLE ID # 546-29-5024
ACCOUNT TYPE Chase Total Checking

DATE OPENED 01/17/2013
New Account
ISSUED BY JPMorgan Chase Bank, N.A. (703)
Palm Canyon and Barona
127742
ELYSSA GUARDINO
(760) 325-1652
01/17/2013

PERSONAL ADDRESS 16605 SAGEBRUSH TRL
DESERT HOT SPRINGS, CA 92241-7335
United States/US Territories

TAXPAYER ID #	DATE OF BIRTH	PRIMARY ID TYPE	PRIMARY ID NUMBER	ISSUER	ISSUANCE DATE	EXP DATE	SECONDARY ID TYPE	SECONDARY ID NUMBER	ISSUER	ISSUANCE DATE	EXP DATE
1) 646-29-5024	01/20/1959	Owner's License	R255218	CA	01/09/2013	08/30/2015	RL-10				
2)											
3)											
4)											
5)											
6)											
7)											
8) (Tax Responsible Id data)											

CUSTOMER(S) TO BE ADDED LATER

ACKNOWLEDGEMENT - By signing this Signature Card, I am applying to JPMorgan Chase Bank, N.A. (the Bank) to open the deposit account indicated above. I certify that the information provided herein is true to the best of my knowledge and authorize the Bank, at its discretion, to obtain credit reports and employment verifications on me. I acknowledge receipt of the Bank's Account Rules and Regulations or other applicable account agreement, which includes all provisions that apply to this deposit account and the Bank Privacy Policy, and agree to be bound by the terms and conditions contained therein as amended from time to time. For joint accounts, I agree that all parties are responsible for any overdraft of any amount due to the return of a deposited check without condition or limitation.

CERTIFICATION - I certify under penalties of perjury that (1) the Taxpayer Identification Number shown above is correct, and (2) I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and (3) I am a U.S. citizen or other U.S. person (as defined in the Form W-9 Instructions).

If the IRS has notified the Depositor that it is subject to backup withholding due to underreporting interest or dividends on its tax return, cross out item 2 above. The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

NAME	DATE	SIGNATURE	NAME	DATE	SIGNATURE
1) STEVEN A GRASHA	1/17/13	<i>[Signature]</i>			
2)					
3)					
4)					
Per AOT					



Account Name : STEVEN A GRASHA

1,150.99

Total No of Transactions	117
No of Accounts	1

Paid Date	Transaction Authorization Date	Transaction Authorization Time	Account Number	Transaction Type	Description	C=Credit D=Debits	Amount
08/03/18	08/02/18	3:46 PM	168692810	ATM Purchase	0802CARL'S JR #1100730 DESERT HOT SP CA 04833160164103563	D	-\$8.17
08/07/18	08/06/18	4:58 PM	168692810	ATM Purchase	0806CARL'S JR #1100730 DESERT HOT SP CA 04833160164103563	D	-\$17.75
08/13/18	08/11/18	10:26 PM	168692810	Chase Online Payment	Online Payment 7394316805 To Two Springs Resort	D	-\$255.13
08/23/18	08/23/18	2:04 PM	168692810	Deposit		C	\$54,000.00
08/24/18	08/24/18	3:18 PM	168692810	Withdrawal		D	-\$25,000.00
08/27/18	08/25/18	11:30 PM	168692810	ATM Purchase	0825CARL'S JR #1100730 DESERT HOT SP CA 04833160164103563	D	-\$4.08
08/29/18	08/28/18	11:59 PM	168692810	Check		D	-\$12,272.64
08/31/18	08/31/18	11:59 PM	168692810	Check		D	-\$10,727.36
09/11/18	09/11/18	11:59 PM	168692810	Check		D	-\$41.00
09/19/18	09/19/18	2:59 PM	168692810	Deposit		C	\$18,000.00
09/19/18	09/19/18	11:59 PM	168692810	Check		D	-\$1,395.36
09/21/18	09/21/18	11:59 PM	168692810	Check		D	-\$950.00
09/26/18	09/26/18	11:59 PM	168692810	Check		D	-\$1,500.00
10/01/18	10/01/18	7:02 PM	168692810	Card Purchase with PIN	1001ARCO #42095 AMPM DESERT HOT SP CA 04833160164103563	D	-\$4.34
10/01/18	10/01/18	11:59 PM	168692810	Check		D	-\$12,000.00
10/02/18	10/02/18	11:59 PM	168692810	Check		D	-\$5,223.50
10/02/18	10/02/18	11:59 PM	168692810	Check		D	-\$35.00
10/02/18	10/01/18	6:28 PM	168692810	ATM Purchase	1001CARL'S JR #1100730 DESERT HOT SP CA 04833160164103563	D	-\$10.11
10/09/18	10/09/18	1:34 PM	168692810	Deposit		C	\$7,000.00
10/09/18	10/08/18	1:44 PM	168692810	ATM Purchase	1008CARL'S JR #1100730 DESERT HOT SP CA 04833160164103563	D	-\$6.77
10/09/18	10/05/18	5:06 PM	168692810	ATM Purchase	1005CARL'S JR #1100730 DESERT HOT SP CA 04833160164103563	D	-\$11.51
10/10/18	10/10/18	9:11 PM	168692810	Card Purchase with PIN	033155101WINDMILL MARKET NORTH PALM SP CA 04833160164103563	D	-\$10.76
10/11/18	10/11/18	2:48 PM	168692810	Card Purchase with PIN	101DENNY'S #9261 N. PALM SPRIN CA 04833160164103563	D	-\$7.85
10/11/18	10/11/18	8:56 PM	168692810	Card Purchase with PIN	733725101WINDMILL MARKET NORTH PALM SP CA 04833160164103563	D	-\$9.95
10/12/18	10/12/18	9:10 PM	168692810	Card Purchase with PIN	9185501012WINDMILL MARKET NORTH PALM SP CA 04833160164103563	D	-\$11.02
10/12/18	10/12/18	2:21 PM	168692810	Card Purchase with PIN	1012ARCO #42609 AMPM DESERT HOT SP CA 04833160164103563	D	-\$56.21
10/12/18	10/10/18	2:38 PM	168692810	ATM Purchase	1010DENNY'S #9261 N. PALM SPRIN CA 04833160164103563	D	-\$7.85
10/15/18	10/13/18	9:52 PM	168692810	Card Purchase with PIN	1013APPLE STORE #R297 73- PALM DESERT CA04833160164103563	D	-\$31.25
10/15/18	10/15/18	8:24 PM	168692810	Card Purchase with PIN	9103321015WINDMILL MARKET NORTH PALM SP CA 04833160164103563	D	-\$11.57
10/15/18	10/13/18	6:42 PM	168692810	Card Purchase with PIN	1013APPLE STORE #R297 73- PALM DESERT CA04833160164103563	D	-\$24.26
10/15/18	10/14/18	6:57 PM	168692810	ATM Purchase	1014SUBWAY 000342 DESERT HOT SP CA04833160164103563	D	-\$10.54
10/15/18	10/13/18	7:13 PM	168692810	ATM Purchase	1013BLAZE PIZZA PALM D PALM DESERT CA 04833160164103563	D	-\$11.58
10/15/18	10/12/18	2:16 PM	168692810	ATM Purchase	1012DENNY'S #9261 N. PALM SPRIN CA 04833160164103563	D	-\$7.85
10/15/18	10/13/18	1:39 PM	168692810	ATM Purchase	1013JACK IN THE BOX 3388 NORTH PALM SP CA04833160164103563	D	-\$5.89
10/15/18	10/14/18	12:09 PM	168692810	ATM Purchase	1014THE COTTAGE TOO DESERT HOT SP CA 04833160164103563	D	-\$7.81
10/16/18	10/16/18	12:15 PM	168692810	Card Purchase with PIN	1016PILOT #0307 N PALM SPG CA 04833160164103563	D	-\$7.41

11/27/18	11/26/18	3:52 PM	168692810	ATM Purchase	D	00	1127PAYPAL "ECHOTECH 402-935-7733 CA 04833160164103563	-\$50.98
11/27/18	11/26/18	5:28 PM	168692810	ATM Purchase	D	05	1126TACO BELL 33354 DESERT HOT SP CA 04833160164103563	-\$6.18
11/27/18	11/26/18	3:52 PM	168692810	ATM Purchase	D	00	1127PAYPAL "LIS 402-935-7733 CA 04833160164103563	-\$19.99
11/27/18	11/25/18	12:40 PM	168692810	ATM Purchase	D	00	1125JACK IN THE BOX 3388 NORTH PALM SP CA04833160164103563	-\$5.89
11/27/18	11/26/18	3:52 PM	168692810	ATM Purchase	D	00	1127PAYPAL "JBTOOLS SALES 402-935-7733 CA 04833160164103563	-\$13.91
11/28/18	11/28/18	10:01 AM	168692810	Card Purchase with PIN	D	05	1128PILOT #0307 N PALM SPG CA 04833160164103563	-\$5.45
11/28/18	11/28/18	10:13 AM	168692810	Card Purchase with PIN	D	05	1128PILOT #0307 N PALM SPG CA 04833160164103563	-\$6.25
11/28/18	11/28/18	7:10 PM	168692810	Card Purchase with PIN	D	05	0113731128WINDMILL MARKET NORTH PALM SP CA 04833160164103563	-\$13.46
11/29/18	11/29/18	7:41 PM	168692810	Card Purchase with PIN	D	05	5361731129PILOT #0307 N PALM SPG CA 04833160164103563	-\$1.99
11/29/18	11/29/18	7:41 PM	168692810	Card Purchase with PIN	D	05	1129PILOT #0307 N PALM SPG CA 04833160164103563	-\$4.36
11/30/18	11/30/18	1:40 PM	168692810	Card Purchase with PIN	D	05	11307-ELEVEN DESERT HOT SP CA 04833160164103563	-\$3.18
11/30/18	11/29/18	3:10 PM	168692810	ATM Purchase	D	90	1129DEL TACO 1092 PALM SPRINGS CA 04833160164103563	-\$6.51

Exhibit A-20

Elect Steve Grasha

Mission Springs Water District



Steve Grasha is the only candidate for Mission Springs Water District Board of Directors that has promised NOT to accept a salary for his work as your representative on the board and he will work day and night make certain that your vote is the correct vote when elected to represent us on the Mission Springs Water District Board of Directors.

Under Jeff Bowman and Nancy Wright our water rates have increased by 22% every year - let me repeat that 22% every single year with a CPI of only 2% and they have refused to stand for election for 6 years until the state required them to stop stalling and answer to the voters for their predatory actions on behalf fat-cat executives and of out of town special interests.

Just this month \$40,000.00 of your money was taken by Jeff Bowman and Nancy Wright from MSWD funds and slipped to The Desert Sun on the same day Nancy and Jeff scheduled an appointment to be interviewed for the newspaper's endorsement. This is being investigated by law enforcement, the transaction may have been discovered too late to file criminal charges before the November 6th election.

Steve will to stop all abusive behavior and predatory rate increases and stop all luxury junkets and unnecessary advertising and payments to all consultants, unneeded lawyers, fake special interest groups and newspapers and free housing to "special friends" that run covert political operations on social media for board members that are only working to continually drive up our water and sewer rates.

WE HAVE HAD ENOUGH...

Steve Grasha will refocus our districts attention to delivering quality water at the lowest possible price. It makes NO sense to have a building filled with dozens of district employees earning more than \$150,000.00 a year and nearly a dozen managers making more than \$200,000.00 and the general manager making over \$300,000.00 a year. This is Desert Hot Springs and these people come here from out of town every day and swindle us out of our hard earned money and go home to Indian Wells, La Quinta, and Rancho Mirage every night and leave us with massive water rate increases, massive crime rates, and empty bank accounts.

There is a reason our local elections are bipartisan.

It is because no matter if you are liberal or conservative or somewhere in between, no one likes to be ripped off. No matter what party affiliation, we want our water to be clean and affordable.

Jeff Bowman and Nancy Wright refuse to talk about the REAL threat to our water.

Jeff and Nancy have sold us out and want us to believe that someone is after our water, yet they refuse to talk about the 4,000,000 gallons a day circulating thru the Sentinel power plant located right on top of our delicate Mission Springs Water District aquifer.

\$50 million from this plant located in the Mission Springs Water District boundaries was meant to mitigate the negative effects on our environment, precious water supply, and our air quality.

Mission Springs Water District officials allowed that promised \$50 million to be confiscated by CVAG to build CVLink from Palm Springs to Indio without a single dollar to directly benefit our community who was originally to be the sole beneficiary of the entire \$50 million.

That coupled with the \$20 million rate increase to remove chromium 6 from our water supply with not one penny actually being used for it's intended purpose. WHAT HAPPENED TO THE

You can quickly see why we need new leadership on our Mission Springs Water District board of directors.

We deserve better, we deserve experienced, active, engaged leadership on our water board to watch out for our community and our precious dwindling water resource.

With thirty-five years of experience as a Technical Water Systems Engineer, Steve Grasha has designed technologically advanced and sophisticated water projects worldwide. Steve Grasha's level of expertise, combined with work in the field, far exceeds the experience of all our current board members combined.

In addition, Steve Grasha will bring 35 years of commitment to our community serving as Chairman of The Riverside County Leadership Forum and Safe Water Project. Steve's primary focus as your director is lowering water and sewer bills while improving customer service for all citizens of the Mission Springs Water District.

As your director, Steve Grasha will work diligently to reverse the constant and never-ending price increases, while guaranteeing access to safe, clean, affordable drinking water—something that all families deserve. The Mission Springs Water District is currently faced with epic challenges that require experienced, steady leadership.

Steve Grasha will provide that experience and dedication while representing our community on the board with great competence, professionalism, and dignity. It is imperative that we move forward, ensuring our shared community goals: providing the basic human right to abundant, fresh, clean, safe, and affordable water for all residents with the highest goals of customer service being achieved.

TWO MILLION DOLLARS WORTH OF FREE WATER SUCKED OUT OF OUR WATER SUPPLY.

\$1,992,870.00 to be exact

One Million Nine Hundred and Ninty Two Thousand Dollars.

This is the amount of money you are collectively paying on your water bill to subsidize Nancy Wright and Jeff Bowman's cozy relationship with Sentinal Energy's MASSIVE power plant located in the Mission Springs Water District.

You have a right to know what these people have been doing to you.

Don't be a victim anymore.

Elect Steve Grasha Director Mission Springs Water District



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Elect Steve Grasha- Mission Springs Water District - PO Box 580430 - North Palm Springs, CA 92258-0430 - USA

NEW LEADERSHIP

Steve

Grasha

MISSION SPRINGS WATER DISTRICT



A five-member board of directors governs our Mission Springs Water District, with each director elected by voters within the boundaries to represent all citizens that rely on our most precious resource.

The directors serve a rotating four-year term. The board establishes policy on the district's mission, goals, and operations. The board represents the general public in deciding issues related to our water and sewer prices and quality of our water supply.

With thirty-five years of experience as a Technical Water Systems Engineer, I have designed technologically advanced and sophisticated water projects worldwide. My level of expertise, combined with work in the field, far exceeds the experience of all our current board members combined.

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I humbly ask for your vote.

Steve Grasha





ABSENTEE BALLOTS HAVE ARRIVED

Save time by avoiding lines at the polls on Election Day - VOTE BY MAIL

Did you know...

- Any voter can vote-by-mail
- You can opt to Vote-by-Mail once or choose to receive all future ballots by mail
- Vote-by-mail ballots are mailed to voters up to 29 days before Election Day
- A Vote-by-mail voter can check their status online to verify the Registrar of Voters has received their ballot
- Vote-by-mail ballots can be returned:
 - by mail
 - at any polling place in the County on Election Day
- Vote by Mail ballots are the first to be counted Election Night

Print and complete the appropriate form below to receive ballots by mail.

[Vote by mail Application for Current Election](#)

[Vote-by-Mail Application](#)

[\[Español\]](#)



Return your ballot as soon as possible to ensure your vote is included in the Election Night Results

(Ballots must be received at the Registrar of Voters Office or any Riverside County polling place by 8:00 p.m. on Election Day or be postmarked on or before Election Day and received no later than three days after Election Day to be counted.)

Mailing Address:

Registrar of Voters
2724 Gateway Drive
Riverside, CA 92507



Steve Grasha For MSWD - We know him, we trust him.

Steve Grasha is a widely respected business executive and community leader here in the Coachella Valley for nearly 40 years. Steve has enjoyed building many great relationships in our community in both his private and public partnerships while serving as President of TrueFog, USA, Steve is best known for inventing the high pressure, stainless steel, residential outdoor misting systems that have become so popular around the world. Steve started the industry and company right here in the Coachella Valley nearly 40 years ago.

Now retired, as an engineer, Steve Grasha has worked on many massive water-related government public infrastructure projects, most recently the San Diego County Water Authority's San Vicente Water Pipeline Tunnel. A massive pipeline project large enough to drive a large pick-up truck through that required boring a giant tunnel through a huge mountain range allowing the supply of critically important Colorado River water to be delivered to the San Diego metropolitan region of Southern California.

Steve Grasha's critical role in this massive public works project required developing, design and building the critically important concrete curing equipment including the policies, procedures, and methods manual to be implemented by construction crews to ensure the longevity of the Billion dollar public works project ensuring the public's investment is protected for generations to come.

COMMITMENT TO PUBLIC SERVICE



Steve Grasha served as your appointed county official representing Desert Hot Springs and The Mission Springs Water District as your conduit to The Riverside County Board of Supervisors.

When The Riverside County Board of Supervisors appointed Steve as your representative on the area's Municipal Advisory Council, as part of his responsibility he was tasked with auditing county policies and procedures regarding a little-known tax on our property tax bill.

After hundreds of hours painstakingly researching county tax and accounting records going all the way back to the 1970's, Steve was able to conclude and prove that an error made by county staff in 1976 allowed for the improper allocation of

That discovery along with a mountain of evidence presented forced the Board of Supervisors to quickly reverse the county's oversight that ultimately leading the way for more than a \$1 Million dollars in road improvements in Desert Hot Springs and the Mission Springs Water District area.

Frankly, Steve's efforts forced the county to remove the tax from your tax bill completely saving you MILLIONS over a short time. In fact, it was the first and only time anyone in Riverside County remembers a tax and special district being virtually eliminated.

As a result of Steve's collaborative work and quiet determination returning the misdirected tax revenue to the rightful place here in our community and during that same time working with the Board of Supervisors and county staff he was able to convince Supervisor Marian Ashley and John Benoit to the need of Desert Hot Springs becoming part of the 4th Supervisory District allowing our community to finally, after many years become an official part of the Coachella Valley political structure, finally granting us an important seat at the table when it comes to critical regional planning and infrastructure issues that affect us all.

It was that work and a joint effort with local leaders that allowed for Millions in public improvements for our community like the new Library, Health Clinic, Public Swimming Pool and improved roads that residents of Desert Hot Springs and the Mission Springs Water District enjoy today.

Steve Grasha is not done yet, with your vote, it is that same professionalism, determination, and commitment that he will put to work as your elected Director at the Mission Springs Water District.

Please Vote for Steve Grasha For MSWD Director

NEW LEADERSHIP

Steve 

Grasha

MISSION SPRINGS WATER DISTRICT

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Steve Grasha

Mission Springs Water District



As we enter the home stretch of this very important election I want to thank you all of you for your words of encouragement over the past few weeks.

I am overwhelmed by the support I have received across the Mission Springs Water District and Desert Hot Springs.

My many years of hard work in our community has resulted in many new amazing relationships with neighbors, friends and public servants who know the work and dedication I put into fighting for our community.

With your VOTE and continued support, I am ready to take that experience and work ethic and represent you on the Board of Directors of the MSWD with great dedication and professionalism.

A five-member board of directors governs our Mission Springs Water District, with each director elected by voters within the boundaries to represent all citizens that rely on our most precious resource.

The directors serve overlapping four-year terms. The board establishes policy on the district's mission, goals, and operations. The board represents the general public in deciding issues related to our water and sewer prices and quality of our water supply.

With thirty-five years of experience as a Technical Water Systems Engineer, I have designed technologically advanced and sophisticated water projects worldwide. My level of expertise, combined with work in the field, far exceeds the experience of all our current board members combined.

In addition, I bring 35 years of commitment to our community serving as Chairman of The Riverside County Leadership Forum and Safe Water Project. My primary focus as your director is lowering water and sewer bills while improving customer service for all citizens of the Mission Springs Water District.

...ensuring that we have clean, affordable drinking water—something that all families deserve. The Mission Springs Water District is currently faced with epic challenges that require experienced, steady leadership.

I will provide that experience and dedication while representing our community on the board with great competence, professionalism, and dignity. It is imperative that we move forward, ensuring our shared community goals: providing the basic human right to abundant, fresh, clean, safe, and affordable water for all residents with the highest goals of customer service being achieved.

I humbly ask for your vote.



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*****CHILD PORN PHOTOS*** OF MSWD DIRECTOR JEFF BOWMAN APPEAR ONLINE FOLLOWED BY MASSIVE SEX OFFENDER RAID ON DESERT HOT SPRINGS BY RIVERSIDE COUNTY DISTRICT ATTORNEY AND MULTIPLE STATE AND FEDERAL LAW ENFORCEMENT AGENCIES.**

LINK TO DISTRICT ATTORNEY'S ANNOUNCEMENT REGARDING SEX OFFENDER RAID



MSWD DIRECTOR JEFF BOWMAN CAUGHT PICTURED NAKED WITH SEEMINGLY UNDERAGE CHILD



The Sexual Assault Felony Enforcement task force, which is overseen by our Bureau of Investigation, recently conducted a compliance operation in the Desert Hot Springs area. The operation was to make sure registered sex offenders are in compliance with the terms of their registration requirements. Also assisting in the operation were the Riverside County Sheriff's Department, Riverside County Probation Department, CACorrections, U.S. Marshals, and the U.S. Border Patrol.



DISTRICT ATTORNEY CONDUCTS SEX OFFENDER RAID ACROSS DESERT HOT SPRINGS

[CHILD PORN PHOTO OF MSWD DIRECTOR JEFF BOWMAN APPEARS ONLINE FOLLOWED BY MASSIVE SEX OFFENDER RAID ON DESERT HOT SPRINGS BY RIVERSIDE COUNTY DISTRICT ATTORNEY AND MULTIPLE STATE AND FEDERAL LAW ENFORCEMENT AGENCIES.](#)

[LINK TO DISTRICT ATTORNEY ANNOUNCEMENT REGARDING SEX OFFENDER RAID](#)

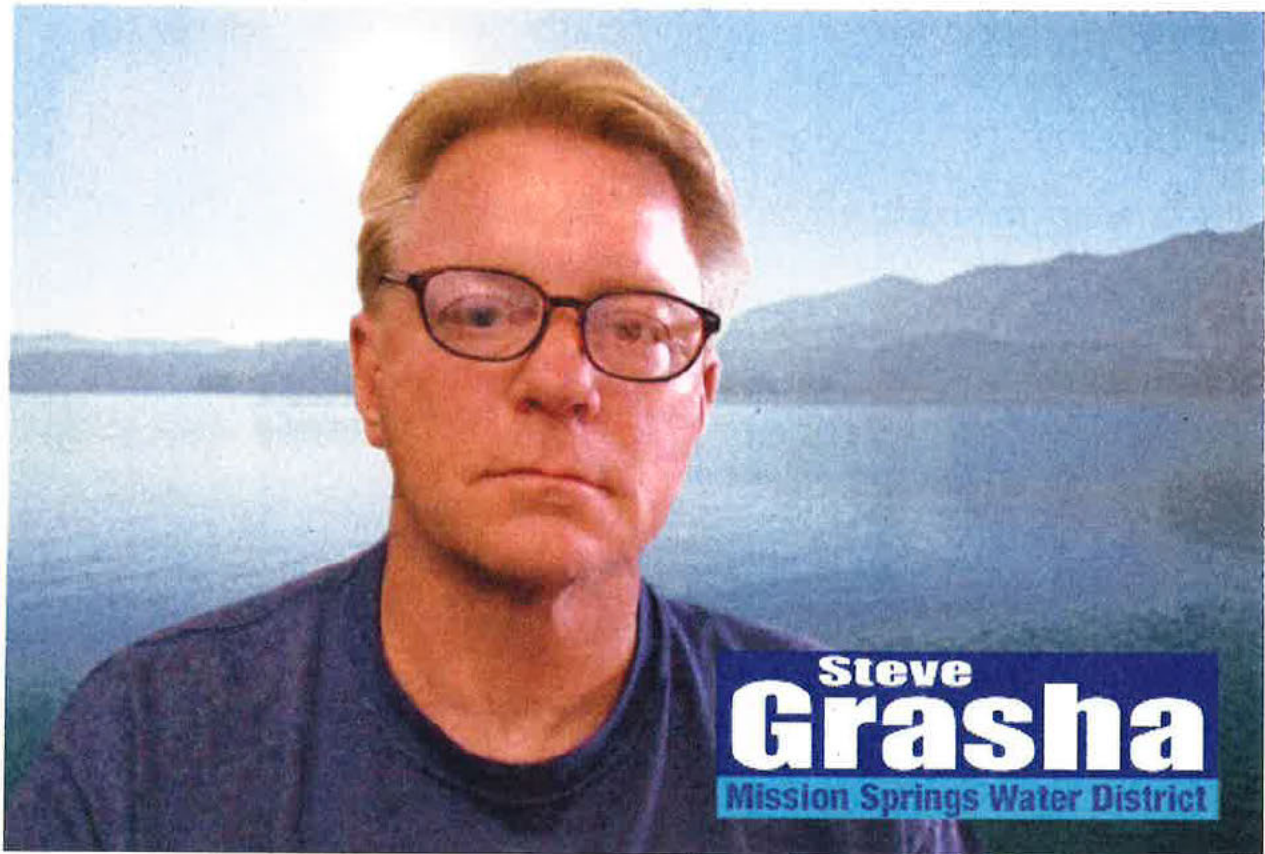
In shocking twist in the Mission Springs Water District election, local support for the Nancy Wright / Jeff Bowman stranglehold on the water district seems to have evaporated after what appear to be CHILD PORN photographs began to circulate online of MSWD Director Jeff Bowman and what appears to be an underage female child with another middle-aged male adult. and seems to have been taken at a nudist colony managed by Bowman and other suspects hidden in the outskirts of Desert Hot Springs.

Just day's after the photograph first appeared on a Desert Hot Springs Facebook group drawing disgust from VIRTUALLY all political groups IN THE CITY including hundreds of people commenting and sharing the photo throughout Riverside County until the photo was removed from Facebook because it may have violated child porn laws and nudity restrictions at the social media giant.

It appears the photo triggered investigators at the Riverside County District Attorney's office resulting in an afternoon raid at multiple locations throughout Desert Hot Springs.



VOTE SAFE - VOTE FOR STEVE GRASHA FOR DIRECTOR AT MSWD
38 Year Resident and Water Systems Engineer



Steve Grasha For MSWD - We know him, we trust him.

Steve Grasha is a widely respected business executive and community leader here in the Coachella Valley for nearly 40 years. Steve has enjoyed building many great relationships in our community in both his private and public partnerships while serving as President of TrueFog, USA, Steve is best known for inventing the high pressure, stainless steel, residential outdoor misting systems that have become so popular around the world. Steve started the industry and company right here in the Coachella Valley nearly 40 years ago.

Now retired, as an engineer, Steve Grasha has worked on many massive water-related government public infrastructure projects, most recently the San Diego County Water Authority's San Vicente Water Pipeline Tunnel. A massive pipeline project large enough to drive a large pick-up truck through that required boring a giant tunnel through a huge mountain range allowing the supply of critically important Colorado River water to be delivered to the San Diego metropolitan region of Southern California.

Steve Grasha's critical role in this massive public works project required developing, design and building the critically important concrete curing equipment including the policies,

procedures, and methods manual to be implemented by construction crews to ensure the longevity of the Billion dollar public works project ensuring the public's investment is protected for generations to come.

COMMITMENT TO PUBLIC SERVICE



Steve Grasha served as your appointed county official representing Desert Hot Springs and The Mission Springs Water District as your conduit to The Riverside County Board of Supervisors.

When The Riverside County Board of Supervisors appointed Steve as your representative on the area's Municipal Advisory Council, as part of his responsibility he was tasked with auditing county policies and procedures regarding a little-known tax on our property tax bill.

After hundreds of hours painstakingly researching county tax and accounting records going all the way back to the 1970's, Steve was able to conclude and prove that an error made by county staff in 1976 allowed for the improper allocation of nearly 300 million dollars countywide and more than \$1.5 Million right here in the Mission Springs Water District and Desert Hot Springs area.

That discovery along with a mountain of evidence presented forced the Board of Supervisors to quickly reverse the county's oversight that ultimately leading the way for more than a \$1 Million dollars in road improvements in Desert Hot Springs and the Mission Springs Water District area.

Frankly, Steve's efforts forced the county to remove the tax from your tax bill completely saving you MILLIONS over a short time. In fact, it was the first and only time anyone in Riverside County remembers a tax and special district being virtually eliminated.

As a result of Steve's collaborative work and quiet determination returning the misdirected tax revenue to the rightful place here in our community and during that same time working with the Board of Supervisors and county staff he was able to convince Supervisor Marian Ashley and John Benoit to the need of Desert Hot Springs becoming part of the 4th Supervisory District allowing our community to finally, after many years become an official part of the Coachella Valley political structure, finally granting us an important seat at the table when it comes to critical regional planning and infrastructure issues that affect us all.

It was that work and a joint effort with local leaders that allowed for Millions in public improvements for our community like the new Library, Health Clinic, Public Swimming Pool and improved roads that residents of Desert Hot Springs and the Mission Springs Water District enjoy today.

Steve Grasha is not done yet, with your vote, it is that same professionalism, determination, and commitment that he will put to work as your elected Director at the Mission Springs Water District.

Please Vote for Steve Grasha For MSWD Director



Copyright © 2018 Elect Steve Grasha- Mission Springs Water District, All rights reserved.

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

Exhibit A-21

From: [Steve Grasha](#)
To: [Ann Flaherty](#)
Cc: lsaray.campaignservices@gmail.com
Subject: RE: From Ann Flaherty RE: Emails
Date: Thursday, December 13, 2018 10:33:46 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

<https://screenshotscdn.firefoxusercontent.com/images/c9ac524b-197c-4067-93b2-ce3a5b6ad4aa.png>



<https://screenshotscdn.firefoxusercontent.com/images/bc946e8f-354d-4e94-947d-1a44beabdf65.png>



<https://screenshotscdn.firefoxusercontent.com/images/82616e13-9786-4b88-a95e-645f948a1643.png>



The email list includes 2006 addresses and I sent a total of 6 emails. I have included screen grabs of the mail chimp account details.

I am sorry for the delay in seeing your request for this information but since my father's stroke I have been only able to focus on his care. I am his only hope for life. Yesterday after more than 10 days without a feeding tube he has chosen to take food again. As you might understand this is a very unsettling time for he and I.

I will make the swearing in tonight but with not near the level of excitement that I should have for such an event.

Please allow me to settle these matters asap so that I can join the ranks of good citizens and not scofflaw's that everyone will try to make me out to be.

I am currently trying to complete the 700 forms. I own a membership at the RV resort that I live at. Must a membership that is not actual real-estate be reported?

I will also inherit my father's estate the will include a house NOT in the Mission Springs Water District, must I report that now or after his passing?

From: Ann Flaherty [mailto:AFlaherty@fppc.ca.gov]
Sent: Tuesday, December 11, 2018 8:14 AM
To: Steve Grasha
Subject: From Ann Flaherty RE: Emails

Dear Mr. Grasha,

I just have a few questions about your email campaign. Can you please tell me how many emails were sent out for each batch of your campaign emails? Ballpark figures are fine if you don't have an exact figure. Also, what program did you use, Mail Chimp? Please let me know. Thanks.

Ann Flaherty
FPPC



Virus-free. www.avg.com

Exhibit A-22

COVER PAGE

Please type or print in ink.

NAME OF FILER (LAST) (FIRST) (MIDDLE)
GRABHA STEVE ALLEN

1. Office, Agency, or Court

Agency Name (Do not use acronyms)
MSWP - MISSION SPRINGS WATER DISTRICT
 Division, Board, Department, District, if applicable Your Position

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: _____ Position: _____

2. Jurisdiction of Office (Check at least one box)

- State
- Multi-County _____
- City of _____
- Judge or Court Commissioner (Statewide Jurisdiction)
- County of Liverside
- Other _____

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2017, through December 31, 2017.
- or-
- The period covered is _____, through December 31, 2017.
- Assuming Office: Date assumed _____
- Leaving Office: Date Left _____ (Check one)
- The period covered is January 1, 2017, through the date of leaving office.
- or-
- The period covered is _____, through the date of leaving office.
- Candidate: Date of Election 11/6/18 and office sought, if different than Part 1: _____

4. Schedule Summary (must complete) ► Total number of pages including this cover page: 1

Schedules attached

- Schedule A-1 - Investments – schedule attached
- Schedule A-2 - Investments – schedule attached
- Schedule B - Real Property – schedule attached
- Schedule C - Income, Loans, & Business Positions – schedule attached
- Schedule D - Income – Gifts – schedule attached
- Schedule E - Income – Gifts – Travel Payments – schedule attached

-or-

None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
 (Business or Agency Address Recommended - Public Document)
Box 580460 N.P.S CA 92258
 DAYTIME TELEPHONE NUMBER E-MAIL ADDRESS
(760) 676-6801

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

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

Date Signed 06/19/2018
 (month, day, year)

Signature [Signature]
 (File the originally signed statement with your filing official.)

Exhibit A-23

RECEIVED JAN 02 2019

(MIDDLE) MSWD ALLEN

Please type or print in ink.

NAME OF FILER (LAST) GRASHA (FIRST) STEVE (MIDDLE) ALLEN

1. Office, Agency, or Court

Agency Name (Do not use acronyms) MISSION SPRINGS WATER DISTRICT
Division, Board, Department, District, if applicable DISTRICT
Your Position DIRECTOR

If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: Position:

2. Jurisdiction of Office (Check at least one box)

- State, Multi-County, City of, Judge or Court Commissioner (Statewide Jurisdiction), County of RIVERSIDE, Other

3. Type of Statement (Check at least one box)

- Annual: The period covered is January 1, 2017, through December 31, 2017.
Assuming Office: Date assumed 12 / 13 / 2018
Leaving Office: Date Left
Candidate: Date of Election and office sought, if different than Part 1:

4. Schedule Summary (must complete) Total number of pages including this cover page: 3

Schedules attached

- Schedule A-1 - Investments - schedule attached
Schedule A-2 - Investments - schedule attached
Schedule B - Real Property - schedule attached
Schedule C - Income, Loans, & Business Positions - schedule attached
Schedule D - Income - Gifts - schedule attached
Schedule E - Income - Gifts - Travel Payments - schedule attached

None - No reportable interests on any schedule

5. Verification

MAILING ADDRESS STREET CITY STATE ZIP CODE
66575 2nd Street Desert Hot Springs CA 92240
DAYTIME TELEPHONE NUMBER E-MAIL ADDRESS
(760) 676-6801 sgrasha@mswd.org

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I acknowledge this is a public document.

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

Date Signed 12/26/2018 (month, day, year)

Signature (File the originally signed statement with your filing official.)

Exhibit A-24



Who We Are



Steve Grasha

Division 1

Steve Grasha was elected in 2022 to represent District 1 and currently serves on the Conservation and Public Affairs Committee.

Steve previously served on the Mission Springs Water District Board of Directors from 2018 to 2022 where he served on the Engineering and Finance Committees.

Steve invented high-pressure stainless steel misting systems enjoyed in Palm Springs and now worldwide. He served as the company's CEO for decades until his retirement in 2015.

He has demonstrated his commitment to the community in both the private and public sectors serving Palm Springs and the entire desert community for decades. Steve worked for two members of Congress, including the first female Speaker in the history of the California State Assembly.

Steve currently serves as Chairman of the Riverside County Leadership Forum's Clean Water Project. He previously served as Interim Executive Director of F.I.N.D. (Food in Need of Distribution), Director of Desert Community Outreach, Desert Business Association and Disaster Services Coordinator for the American Red Cross and received their Volunteer of the Year Award.

Steve is a resident of North Palm Springs.

[Click here to email Director Grasha](#)



ABOUT US

Desert Water Agency was founded as a groundwater management agency in the western Coachella Valley in 1961 and started providing water service to customers in Palm Springs and Cathedral City in 1968.

QUICK LINKS



[Careers](#)

[FAQ](#)

[Pay My Bill](#)

OUR ADDRESS

 (760) 323-4971

 1200 S Gene Autry Trail Palm Springs,  [Contact](#)
California, 92264

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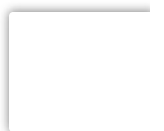


Exhibit A-25

**Statement of Organization
Recipient Committee**

Statement Type

<input checked="" type="checkbox"/> Initial <input type="checkbox"/> Not yet qualified or <input checked="" type="checkbox"/> Date qualification threshold met 8 / 16 / 2022	<input type="checkbox"/> Amendment Date qualification threshold met _____ / _____ / _____	<input type="checkbox"/> Termination - See Part 5 Date of termination _____ / _____ / _____
---	--	--

Date Stamp
RECEIVED
2022 SEP -6 PM 3:32
REGISTRAR OF VOTERS
COUNTY OF RIVERSIDE

CALIFORNIA FORM 410
For Official Use Only

1. Committee Information				I.D. Number (if applicable) in application				2. Treasurer and Other Principal Officers					
NAME OF COMMITTEE Steve Grasha for Desert Water Agency				NAME OF TREASURER Steve Grasha				STREET ADDRESS (NO PO BOX) [REDACTED]					
STREET ADDRESS (NO PO BOX) [REDACTED]				CITY NORTH PALM SPRINGS				STATE CA		ZIP CODE 92258		AREA CODE/PHONE [REDACTED]	
CITY North Palm Springs		STATE CA		ZIP CODE 92258		AREA CODE/PHONE [REDACTED]		NAME OF ASSISTANT TREASURER, IF ANY NA					
FULL MAILING ADDRESS (IF DIFFERENT) [REDACTED]				STREET ADDRESS (NO PO BOX) NA				CITY NA					
E-MAIL ADDRESS (REQUIRED) / FAX (OPTIONAL) [REDACTED]				STATE NA				ZIP CODE		AREA CODE/PHONE			
COUNTY OF DOMICILE Riverside County		JURISDICTION WHERE COMMITTEE IS ACTIVE Riverside County		NAME OF PRINCIPAL OFFICER(S) NA				STREET ADDRESS (NO PO BOX) NA					
Attach additional information on appropriately labeled continuation sheets.				CITY NA				STATE		ZIP CODE		AREA CODE/PHONE	

3. Verification

I have used all reasonable diligence in _____ knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the information is true and correct.

Executed on 09-02-2022 _____
DATE

Executed on 09-02-2022 _____
DATE

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

**Statement of Organization
Recipient Committee**

INSTRUCTIONS ON REVERSE

Page 2

COMMITTEE NAME
Steve Grasha for Desert Water Agency

I.D. NUMBER
In Application

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

NAME OF FINANCIAL INSTITUTION CHASE BANK	AREA CODE/PHONE [REDACTED]	BANK ACCOUNT NUMBER [REDACTED]
ADDRESS [REDACTED]	CITY Palm Springs	STATE CA
		ZIP CODE 92264

4. Type of Committee Complete the applicable sections.

Controlled Committee

- List the name of each controlling officeholder, candidate, or state measure proponent. If candidate or officeholder controlled, also list the elective office sought or held, and district number, if any, and the year of the election.
- List the political party with which each officeholder or candidate is affiliated or check "nonpartisan." Stating "No party preference" is acceptable
- If this committee acts jointly with another controlled committee, list the name and identification number of the other controlled committee.

NAME OF CANDIDATE/OFFICEHOLDER/STATE MEASURE PROPONENT	ELECTIVE OFFICE SOUGHT OR HELD (INCLUDE DISTRICT NUMBER IF APPLICABLE)	YEAR OF ELECTION	PARTY CHECK ONE		
Steven A Grasha	Board Member - Desert Water Agency	2022	Nonpartisan <input checked="" type="checkbox"/>	Partisan <input type="checkbox"/>	(list political party below) Democrat
			Nonpartisan <input type="checkbox"/>	Partisan <input type="checkbox"/>	(list political party below)

Primarily Formed Committee

Primarily formed to support or oppose specific candidates or measures in a single election. List below:

CANDIDATE(S) NAME OR MEASURE(S) FULL TITLE (INCLUDE BALLOT NO. OR LETTER) IF A RECALL, STATE "RECALL" IN FRONT OF THE OFFICEHOLDER'S NAME.	CANDIDATE(S) OFFICE SOUGHT OR HELD OR MEASURE(S) JURISDICTION (INCLUDE DISTRICT NO., CITY OR COUNTY, AS APPLICABLE)	CHECK ONE	
Steven A Grasha	Desert Water Agency - Division #1	SUPPORT <input checked="" type="checkbox"/>	OPPOSE <input type="checkbox"/>
		SUPPORT <input type="checkbox"/>	OPPOSE <input type="checkbox"/>

Exhibit A-26

497 Contribution Report

Amounts may be rounded to whole dollars.

NAME OF FILER Steve Grasha For Desert Water Agency			Date of This Filing 9-1-22	Date Stamp RECEIVED 2022 SEP 19 PM 12: 16 REGISTRAR OF VOTERS COUNTY OF RIVERSIDE	CALIFORNIA FORM 497 For Official Use Only
AREA CODE/PHONE NUMBER [REDACTED]	I.D. NUMBER (if applicable) not yet assigned		Report No. 1		
STREET ADDRESS [REDACTED]			<input type="checkbox"/> Amendment to Report No. _____ (explain below)		
CITY North Palm Springs	STATE CA	ZIP CODE 92258	No. of Pages 1		

1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE*	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
9-31-2022	Steve Grasha [REDACTED] North Palm Springs, CA 92258	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	10,000 <input checked="" type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate

Reason for Amendment: _____

* Contributor Codes
 IND - Individual
 COM - Recipient Committee (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

497 Contribution Report

Amounts may be rounded to whole dollars.

NAME OF FILER Steve Grasha For Desert Water Agency - Division #1 - 2022			Date of This Filing 10-7-22	Date Stamp 2022 OCT 19 PM 5:03	CALIFORNIA FORM 497 For Official Use Only REGISTRATION OF VOTERS COUNTY OF RIVERSIDE
AREA CODE/PHONE NUMBER [REDACTED]	I.D. NUMBER (if applicable) not yet assigned		Report No. 2		
STREET ADDRESS [REDACTED]			<input type="checkbox"/> Amendment to Report No. _____ (explain below)		
CITY North Palm Springs	STATE CA	ZIP CODE 92258	No. of Pages 1		

1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE*	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED
10-7-2022	Steve Grasha [REDACTED] North Palm Springs, CA 92258	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	5,000 <input checked="" type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate

Reason for Amendment: _____

* Contributor Codes
 IND - Individual
 COM - Recipient Committee (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

497 Contribution Report

Amounts may be rounded to whole dollars.

NAME OF FILER Steve Grasha For Desert Water Agency - Division #1 - 2022		Date of This Filing 10-21-22	Date/Stamp OCT 26 AM 9:10 REGISTRATION UNIT COUNTY OF RIVERSIDE	CALIFORNIA FORM 497 For Official Use Only
AREA CODE/PHONE NUMBER [REDACTED]	I.D. NUMBER (if applicable) not yet assigned	Report No. 3		
STREET ADDRESS 14200 North Indian Canyon		<input type="checkbox"/> Amendment to Report No. _____ (explain below)		
CITY North Palm Springs	STATE CA	ZIP CODE 92258	No. of Pages 1	

1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE*	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
10-7-2022	Steve Grasha [REDACTED] North Palm Springs, CA 92258	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	5,000 <input checked="" type="checkbox"/> Check if Loan _____% <small>Provide interest rate</small>
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% <small>Provide interest rate</small>
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% <small>Provide interest rate</small>

Reason for Amendment: _____

* Contributor Codes
 IND - Individual
 COM - Recipient Committee (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

497 Contribution Report

Amounts may be rounded to whole dollars.

NAME OF FILER Steve Grasha For Desert Water Agency - Division #1 - 2022			Date of This Filing 11-3-22	Date Stamp RECEIVED 2022 NOV -8 PM REGISTRAR OF COUNTY OF RIVERS	CALIFORNIA FORM 497 For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) not yet assigned		Report No. 4		
STREET ADDRESS			<input type="checkbox"/> Amendment to Report No. _____ (explain below)		
CITY	STATE	ZIP CODE	No. of Pages 1		
North Palm Springs	CA	92258			

1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE*	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
11-3-2022	Steve Grasha [REDACTED] North Palm Springs, CA 92258	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired	5,000 <input checked="" type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate

Reason for Amendment: _____

* Contributor Codes
 IND - Individual
 COM - Recipient Committee (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

Exhibit A-27

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Date Stamp
RECEIVED
2023 SEP 14 AM 9:21
COUNTY OF MADERA

CALIFORNIA FORM 460

Page 1 of 12

For Official Use Only

Statement covers period
from 01/01/2022
through 09/24/2022

Date of election if applicable:
(Month, Day, Year) 11/05/2022

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees – Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
- State Candidate Election Committee
- Recall
(Also Complete Part 5)
- General Purpose Committee
- Sponsored
- Small Contributor Committee
- Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
- Controlled
- Sponsored
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- Preelection Statement
- Semi-annual Statement
- Termination Statement
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER

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

Steve Grasha for Water Board 2022

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

Desert Hot Springs CA 92258

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

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

Steve Grasha

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

Desert Hot Springs CA 92258

NAME OF ASSISTANT TREASURER, IF ANY

David L. Gould

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

Norwalk CA 90650

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing

Executed on 09/06/2023
Date

Executed on 09/06/2023
Date

Executed on _____
Date

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Exhibit A-28

**Recipient Committee
Campaign Statement
Cover Page**

(Government Code Sections 84200-84216.5)

Date Stamp
RECEIVED
SEP 17 AM 9:21

CALIFORNIA FORM 460

Page 1 of 8

For Official Use Only

Statement covers period
from 09/25/2022
through 10/22/2022

Date of election if applicable:
(Month, Day, Year)
11/05/2022

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees – Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
 - State Candidate Election Committee
 - Recall
(Also Complete Part 5)
- General Purpose Committee
 - Sponsored
 - Small Contributor Committee
 - Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
 - Controlled
 - Sponsored
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- Preelection Statement
- Semi-annual Statement
- Termination Statement
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Steve Grasha for Water Board 2022

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE
Desert Hot Springs CA 92258

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

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER
Steve Grasha

MAILING ADDRESS
STATE ZIP CODE AREA CODE/PHONE
CA 92258

NAME OF ASSISTANT TREASURER, IF ANY
David L. Gould

MAILING ADDRESS
STATE ZIP CODE AREA CODE/PHONE
Norwalk CA 90650

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to ensure that the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 09/06/2023
Date

By _____

Executed on 09/06/2023
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Exhibit A-29

**Recipient Committee
Campaign Statement
Cover Page**
(Government Code Sections 84200-84216.5)

COVER PAGE

Date Stamp
RECEIVED
2023 SEP 14 AM 9:21
COUNTY OF RIVERSIDE

CALIFORNIA FORM 460

Page 1 of 11

For Official Use Only

Statement covers period
from 10/23/2022
through 12/31/2022

Date of election if applicable:
(Month, Day, Year) 11/05/2022

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees – Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
 - State Candidate Election Committee
 - Recall
(Also Complete Part 5)
- General Purpose Committee
 - Sponsored
 - Small Contributor Committee
 - Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
 - Controlled
 - Sponsored
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- Preelection Statement
- Semi-annual Statement
- Termination Statement
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Steve Grasha for Water Board 2022

STREET ADDRESS (NO P.O. BOX)
[REDACTED]

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Desert Hot Springs</u>	<u>CA</u>	<u>92258</u>	[REDACTED]

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

CITY	STATE	ZIP CODE	AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS
[REDACTED]

Treasurer(s)

NAME OF TREASURER
Steve Grasha

MAILING ADDRESS
[REDACTED]

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Desert Hot Springs</u>	<u>CA</u>	<u>92258</u>	[REDACTED]

NAME OF ASSISTANT TREASURER, IF ANY
David L. Gould

MAILING ADDRESS
[REDACTED]

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Norwalk</u>	<u>CA</u>	<u>90650</u>	[REDACTED]

OPTIONAL: FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge and belief the information herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 09/06/2023
Date

By [REDACTED] Treasurer

Executed on 09/06/2023
Date

By [REDACTED] Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on _____
Date

By _____
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Exhibit A-30

Inactive ...

Oct 7, 2022 - Oct 8, 2022

Platforms

Categories

Estimated Audience Size: **50K - 100K people**

Amount spent (USD): **<\$100**

Impressions: **2K - 3K**

ID: 804542647640522

See ad details

Elect Steve Grasha, Director, Desert Water Agency
Sponsored • Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since....



Active ...

Started running on Oct 7, 2022

Platforms

Categories

Estimated Audience Size: **50K - 100K people**

Amount spent (USD): **<\$100**

Impressions: **2K - 3K**

ID: 1624179911330035

See ad details

Elect Steve Grasha, Director, Desert Water Agency
Sponsored • Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since....



Inactive ...

Oct 4, 2022 - Oct 6, 2022

Platforms

Categories

Estimated Audience Size: **50K - 100K people**

Amount spent (USD): **<\$100**

Impressions: **<1K**

ID: 507086260845234

See ad details

Elect Steve Grasha, Director, Desert Water Agency
Sponsored • Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since....



Inactive ...

Oct 3, 2022 - Oct 3, 2022

Platforms

Categories

Estimated Audience Size: **100K - 500K people**

Amount spent (USD): **<\$100**

Impressions: **<1K**

ID: 109338898236687

See ad details

Elect Steve Grasha, Director, Desert Water Agency
Sponsored • Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since....



Inactive ...

Sep 30, 2022 - Oct 6, 2022

Platforms

Categories

Estimated Audience Size: **100K - 500K people**

Amount spent (USD): **\$200 - \$299**

Impressions: **9K - 10K**

ID: 1280670229141232

See ad details

Elect Steve Grasha, Director, Desert Water Agency
Sponsored • Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since....



Inactive ...

Sep 30, 2022 - Oct 2, 2022

Platforms

Categories

Estimated Audience Size: **50K - 100K people**

Amount spent (USD): **\$100 - \$199**

Impressions: **5K - 6K**

ID: 641654534021627

See ad details

Elect Steve Grasha, Director, Desert Water Agency
Sponsored • Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since....



9 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.

Active ...

Started running on Oct 27, 2022

Platforms

Categories

Estimated Audience Size: 50K - 100K people

Amount spent (USD): \$300 - \$399

Impressions: 20K - 25K

ID: 1177898629483406

See ad details

 **Elect Steve Grasha, Director, Desert Water Agency**
Sponsored · Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinctio...



Inactive ...

Oct 24, 2022 - Oct 31, 2022

Platforms

Categories

Estimated Audience Size: 50K - 100K people

Amount spent (USD): \$1K - \$1.5K

Impressions: 70K - 80K

ID: 5516911801761314

See ad details

 **Elect Steve Grasha, Director, Desert Water Agency**
Sponsored · Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinctio...



Inactive ...

Oct 15, 2022 - Oct 24, 2022

Platforms

Categories

Estimated Audience Size: 50K - 100K people

Amount spent (USD): \$400 - \$499

Impressions: 25K - 30K

ID: 5441179942659517

See ad details

 **Elect Steve Grasha, Director, Desert Water Agency**
Sponsored · Paid for by Steve Grasha

40 Years of Palm Springs Business Excellence

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and now worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinctio...



Exhibit A-31

(20+) Elect Steve Grasha, Director, Desert Water Agency - Posts | Facebook
<https://www.facebook.com/directorgrasha/posts/647422859097933>

rch Facebook

ELECT STEVE GRASHA FOR DESERT WATER AGENCY

DIVISION #1 TUESDAY, NOVEMBER 8, 2022

A LEADER WE KNOW A LEADER WE TRUST

Elect Steve Grasha, Director, Desert Water Agency
@directorgrasha · Public figure

Send message

Hi! Please let us know how we can help.

Like

Home Reviews About Videos More

Ask Elect Steve Grasha, Director, Desert Water Agency

Create post

Photo/video Check in Tag friends



Elect Steve Grasha, Director, Desert Water Agency

May 21 at 7:57 AM · 🌐



Elect Steve Grasha, Director, Desert Water Agency updated their cover photo.

May 19 at 1:02 PM · 🌐



👍 Like

💬 Comment

➦ Share

<https://mobile.twitter.com/realstevegrasha>



Steve Grasha

7,178 Tweets

ELECT
STEVE GRASHA
FOR DESERT WATER AGENCY

DIVISION #1
TUESDAY, NOVEMBER 8, 2022



A LEADER WE KNOW
A LEADER WE TRUST



Follow

Steve Grasha

@RealSteveGrasha

Director at MSWD. In pursuit of safe, clean, affordable drinking water and sanitation for all as the bedrock of all human rights. #cawater

📍 Desert Hot Springs 📅 Joined March 2011

5,802 Following 5,274 Followers

Tweets

Tweets & replies

Media

Likes



Steve Grasha Retweeted



Father Spyridon Bailey @Fatherspyridon · May 26



"This is the aim of the enemy of the human race, the devil: to continually sift us like wheat, forcing us to constantly spin in the whirlwind of entertainments and diversions, not allowing us to collect ourselves and contemplate our inner state, our soul." ~ Archbishop Averky

🗨️ 8

🔄 139

❤️ 553



Exhibit A-32

STEVE GRASHA

FOR MISSION SPRINGS WATER DISTRICT

As a water systems engineer, Steve Grasha is a widely respected business executive and community leader here in the Coachella Valley for nearly 40 years. Steve Grasha has enjoyed building many great relationships in our community in both his private and public partnerships while serving as President of TrueFog, USA. Steve Grasha is best known for inventing the high pressure, stainless steel, residential outdoor misting system that has become so popular around the world.

Steve Grasha has worked on many massive water-related government public infrastructure projects, most recently, the San Diego County Water Authority's, San Vicente Water Pipeline Tunnel. A massive pipeline project allowing the supply of critically important Colorado River water to be delivered to the San Diego metropolitan region.

Steve Grasha served as your appointed county official representing Desert Hot Springs and The Mission Springs Water District as your conduit to The Riverside County Board of Supervisors. After hundreds of hours researching county records going all the way back to the 1970's, Steve was able to conclude an error made by county staff in 1976 allowed for the improper allocation returning nearly 300 million dollars county-wide, and more than \$1.5 Million right here in the Mission Springs Water District and Desert Hot Springs area.

Steve Grasha is not done yet, with your vote, it is that same professionalism, determination, and commitment that he will put to work as your elected Director at the Mission Springs Water District.

Paid for by Steve Grasha for Mission Springs Water District 2018
P.O. Box 580460
Desert Hot Springs, CA 92285



Presorted Std.
U.S. Postage
PAID
Victory Mail

On November 6, Elect Steve Grasha

DIRECTOR – MISSION SPRINGS WATER DISTRICT

With thirty-five years of experience as a Technical Water Systems Engineer, I have designed technologically advanced and sophisticated water projects worldwide. My level of expertise, combined with work in the field, far exceeds the experience of all our current board members combined.

In addition, I bring 35 years of commitment to our community serving as Chairman of The Riverside County Leadership Forum and Safe Water Project. My primary focus as your director is lowering water and sewer bills, while improving customer service for all citizens of the Mission Springs Water District.

As your director, I will work diligently to reverse the constant and never-ending price increases, while guaranteeing access to safe, clean, affordable drinking water—something that all families deserve. The Mission Springs Water District is currently faced with epic challenges that require experienced, steady leadership.

I will provide that experience and dedication while representing our community on the board with great competence, professionalism and dignity. It is imperative that we move forward, insuring our shared community goals: providing the basic human right to abundant, fresh, clean, safe, and affordable water for all residents with the highest goals of customer service being achieved.

I humbly ask for your vote.

Steve Grasha



Paid for by Steve Grasha for Mission Springs Water District 2018
P.O. Box 580460
Desert Hot Springs, CA 92285

Presorted Str
U.S. Postage
PAID
Victory Mail



On November 6, Elect Steve Grasha

DIRECTOR, MISSION SPRINGS WATER DISTRICT

Steve Grasha is the only candidate that has promised **NOT** to take a salary and will work to lower water and sewer rates for ALL MSWD Customers.

Steve Grasha is an experienced **Water Systems Engineer** with 35 years' experience and is ready to lead.



Steve
Grasha
Mission Springs Water District

THE SAFE WATER CHOICE!

Paid for by Steve Grasha for Mission Springs Water District 2018
P.O. Box 580460
Desert Hot Springs, CA 92285

Presorted S
U.S. Postal
PAID
Victory Me

No ID #
- Look at
Address





Marshall Tuck
Superintendent of
Public Instruction
Tuck's top priority is preparing
students for 21st Century Jobs.

Yes on Proposition 5*
 Property Tax Fairness
for Seniors, the Severely
Disabled and Natural
Disaster Victims.

No on Proposition 8*
 NO on 8. Join Taxpayer groups,
CA Medical Association,
Stop Dangerous and Costly
Dialysis Proposition.

No on Proposition 10*
 Puts government in
charge of all housing.
Costs millions leading
to higher taxes.

RIVERSIDE COUNTY EDITION VOTER'S GUIDE (TAKE THIS TO THE POLLS WITH YOU)

State Assembly, Dist 42



Chad Mayes*
Few stand taller than Chad Mayes to Protect Prop 13.

Mission Springs Water District



Steve Grasha*
New Leadership - Tax Fighter - Ground Water
Guardian - Lower Water Rates.

Vote **YES ON PROP 6** .com
Gas Tax Repeal Initiative

Vote YES ON PROPOSITION 6*
to repeal the gas tax increase
and require voter approval
for future gas taxes.

161-330050830
101

NOTICE TO VOTERS: THIS DOCUMENT WAS PREPARED BY SAVE PROPOSITION 13 SEGREGATED FUND ACCOUNT, NOT AN OFFICIAL POLITICAL PARTY ORGANIZATION. Appearance in this mailer does not necessarily imply endorsement of others appearing in this mailer, nor does it imply endorsement of, or opposition to, any issues set forth in this mailer. Appearance is paid for and authorized by each candidate and ballot measure which is designated by a*.

SAVE Proposition 13 NEWSLETTER

November 6, 2018 • Volume 16 • Number 2

James V. Lacy, Treasurer

Published irregularly by Save Proposition 13 Segregated Fund Account, a Project of Save Proposition 13 Candidate & Legislation Evaluation Committee
5405 Alton Parkway, Ste 5A-#369 • Irvine, CA 92604



Save Proposition 13



JON COUPAL
President, Howard Jarvis
Taxpayers Association

GUEST COLUMNIST

AFTER 40 YEARS, PROPOSITION 13 IS MORE IMPORTANT THAN EVER

By Jon Coupal, President, Howard Jarvis Taxpayers Association

The reason is simple. As more citizens understand Proposition 13 and how it works, the more they like it and want to keep it.

Let's recap: Prop. 13 limits the tax rate on all real estate in California to one percent and limits increases in the taxable value of property – often referred to as the "assessed value" – to two percent per year. This prevents "sticker shock" for property owners when opening their tax bills compared to the previous year's bill. Property is reassessed to full market value when it is sold. This system of taxing property benefits homeowners, because Proposition 13 makes property taxes predictable and stable so homeowners can budget for taxes and remain in their homes.

Renters benefit because Proposition 13 makes property taxes predictable and stable for owners of residential rental property, and this helps to reduce upward pressure on rents. If one believes that California's current housing crisis is bad now, imagine how high rents would be if the owners of the property were forced to pass along their

higher tax bills to their tenants. In truth, Proposition 13 increases the likelihood that renters, too, will be able to experience the American Dream of homeownership.

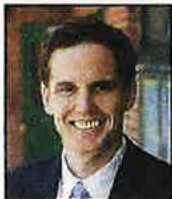
Local government and schools benefit because Proposition 13 provides a reliable, stable and growing revenue source. Even when real property values drop, property tax revenues continue to grow. Indeed, some counties in California actually saw year-over-year increases in property tax revenue despite declining market values during the great recession. It is also important to note that even with Prop. 13, California remains a high property tax state. We are significantly higher than average in per capita property tax collections.

Neighborhoods benefit from Proposition 13 due to the fact that it helps to stabilize neighborhoods, as residents are no longer driven out by unaffordable tax increases. Indeed, keeping neighborhoods intact was one of the key rationales that the U.S. Supreme Court cited when it rejected a challenge to Proposition 13 in 1992.

The Howard Jarvis Taxpayers Association, whose primary mission is to defend Proposition 13, is optimistic about its future. Our only real challenge is one of education – making sure that all voters learn the truth about Prop 13.

ATTENTION VOTERS: Save Proposition 13 is an independent organization and is not affiliated or controlled by any other organization. Save Proposition 13 is solely responsible for this mailing, and for the decisions to list particular candidate and measure advertising in this newsletter.

ADVERTISEMENT



Marshall Tuck
Superintendent of
Public Instruction

Marshall Tuck is an education reformer, not a politician. He'll take on the Sacramento establishment to fight for accountability for every education dollar spent and put more money in classrooms.



**Yes on
Proposition 5***

Endorsed by the Howard Jarvis Taxpayers Association and CalTax, Proposition 5 eliminates the property tax moving penalty that hurts seniors, the severely disabled and natural disaster victims throughout California. VoteYesOnProp5.com

Vote **YES ON PROP 6**.com
Gas Tax Repeal Initiative

Join Howard Jarvis Taxpayers Association in supporting Yes on 6*, Gas Tax Repeal!

NO on 10*

A Flawed Initiative That Will Make The Housing Crisis Worse

Prop 10 puts government in control of housing, even your own single-family home. Legislative Analyst reports it will cost hundreds of millions of dollars that could lead to higher taxes.

Marshall Tuck



Superintendent of Public Instruction
Tuck's top priority is preparing students for 21st Century Jobs.

Yes on Prop 5



Property Tax Fairness for Seniors, the Severely Disabled and Natural Disaster Victims.

No on Prop 8



NO on 8: Join Taxpayer groups, CA Medical Association, Stop Dangerous and Costly Dialysis Proposition.

No on Prop 10



Put government in charge of all housing. Costs millions leading to higher taxes.

Mission Springs Water District



Steve Grasha
Tax Assessment Fighter - Ground Water Guardian - Lower Water Rates.

Vote **YES ON PROP 6** .com
Gas Tax Repeal Initiative

Vote YES ON PROPOSITION 6
to repeal the gas tax increase
and require voter approval
for future gas taxes.

NOTICE TO VOTERS: THIS DOCUMENT WAS PREPARED BY NATIONAL TAX LIMITATION COMMITTEE NEWSLETTER, NOT AN OFFICIAL POLITICAL PARTY ORGANIZATION. Appearance in this publication does not necessarily imply endorsement of others appearing in this matter, nor does it imply endorsement of, or opposition to, any issues set forth in this matter. Appearance is paid for and authorized by each candidate and ballot measure which is supported by it.

Experienced, Transparent, Trusted Leadership

Steve Grasha

Desert Water Agency

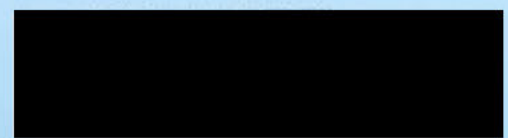
Improved Water Quality • Sustainable Water Policies • Safe, Clean, Affordable



**We Know Him
We Trust Him**

Steve Grasha for Desert Water Agency
P.O. Box 580460
North Palm Springs, CA 92258
FPPC# Pending

PRESORTED
STANDARD
U.S. POSTAGE
PAID
VICTORY MAIL



Leadership We Know and Trust

Director Grasha is best known in Palm Springs for inventing the high-pressure misting systems we enjoy here in Palm Springs and worldwide. Steve served as the company's CEO for decades until his retirement in 2015 and was soon elected to our local waterboard, where he has served with honor and distinction ever since.

Steve Grasha has long demonstrated his commitment to our community in both the private and public sector serving Palm Springs and the entire desert community for decades, having worked for two members of Congress, including the first female Speaker of the California State Assembly,

Currently serving as Chairman of the Riverside County Leadership Forum's Clean Water Project, Director Grasha has also served as Interim Executive Director of F.I.N.D. (Food in Need of Distribution), Director of Desert Community Outreach, Desert Business Association, the Desert Aids Project Organizing Committee, and Disaster Services Coordinator for the American Red Cross and was honored to receive the Volunteer of The Year Award from the American Red Cross.

Vote for Steve Grasha for Desert Water Agency to continue working for safe, clean, affordable drinking water.

Steve Grasha
For Desert Water Agency



STEVEN A GRASHA
STEVE GRASHA FOR DESERT WATER AGENCY

113

DATE

10/6/22

PAY TO THE
ORDER OF

ARON THOMAS + ASSOCIATES \$ 3,326.91

Three Thousand Three Hundred ~~Twenty Six~~ ⁹¹/₁₀₀ DOLLARS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO

#420872

[Signature]

MP

STEVEN A GRASHA
STEVE GRASHA FOR DESERT WATER AGENCY

114

DATE 10-16-22

PAY TO THE ORDER OF Aaron Thomas

\$3226.91

Three thousand two hundred twenty six and 91/100 DOLLARS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO 11/01/22 420900

[Signature]

Security Features
Include
Oversize Ink

MP

STEVEN A GRASHA
STEVE GRASHA FOR DESERT WATER AGENCY

115

DATE 10-21-22

ORDER OF Aaron THOMAS & Associates \$3,065.22

Three Thousand Sixty Five and 22/100

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

DOLLARS



Security Features
Include
Optical Scan

MEMO 421053

MP

STEVEN A GRASHA
STEVE GRASHA FOR DESERT WATER AGENCY

116

DATE 10-28-22

PAY TO THE ORDER OF Baron Thomas

\$ 2,915.29

Two Thousand Nine Hundred Fifteen and 29/100 DOLLARS

CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO 421180

[Signature]
MP

Exhibit A-33



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

August 30, 2024

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
1200 S. Gene Autry Trail
Palm Springs, CA 92264

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC No. 2018-01268; In the Matter of Steve Grasha for Mission Springs Water District 2018, Steve Grasha for Desert Water Agency 2022, and Steve Grasha

Dear Steve Grasha,

On July 16, 2024, you were personally served with an accusation in the above-referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default will appear on the published agenda for the Commission’s public meeting on **September 19, 2024**. This agenda will be public and you could be contacted by the media with questions. The Commission will be asked to adopt the default at the subsequent public meeting on **October 17, 2024** and impose an administrative penalty of \$40,000 against you.

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

You may still resolve this matter informally by way of a stipulated settlement if an agreement can be reached prior to this matter appearing for consideration by the Commission. Please contact me at (279) 237-5932 or mcorona@fppc.ca.gov if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

Marissa Corona

Marissa Corona
Commission Counsel,
Enforcement Division

¹ Government Code section 11505.



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

October 1, 2024

Steve Grasha, individually and o/b/o
Steve Grasha for Mission Springs Water District 2018
Steve Grasha for Desert Water Agency 2022
1200 S. Gene Autry Trail
Palm Springs, CA 92264

NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC No. 2018-01268; In the Matter of Steve Grasha for Mission Springs Water District 2018, Steve Grasha for Desert Water Agency 2022, and Steve Grasha

Dear Steve Grasha,

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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 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 October 17, 2024 meeting. Please contact me at (279) 237-5932 or mcorona@fppc.ca.gov if you wish to enter into a negotiated settlement.

¹ Government Code Section 11505.

Sincerely,



Marissa Corona
Commission Counsel
Enforcement Division

Enclosures: Default Decision and Order, Exhibit 1 and attachments