



September 15, 2023

Antonio Alatorre  
1040 Flynn Road  
Camarillo, CA 93012

**No Action Closure Letter: FPPC No. 2019-00229, Antonio Alatorre**

Dear Antonio Alatorre:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This case was opened in response to an anonymous complaint alleging violations of the Act’s conflict of interest provisions as a member of the Ventura County Medi-Cal Managed Care Commission (VCMCC). The Enforcement Division will close this case with no further action.

No public official at any level of state or local government may make, participate in making, or in any way attempt to use their official position to influence a governmental decision in which they know or have reason to know they have a financial interest.<sup>2</sup> Section 87200 of the Act requires certain public officials who manage public investments to disclose reportable interests in regularly filed Statements of Economic Interests (SEIs). When an official identified in Section 87200 is disqualified from a governmental decision, the official must identify the interest, recuse themselves and leave the room.<sup>3</sup>

Our investigation determined that you timely filed your SEIs for calendar years 2015 – 2018. In these SEIs, you disclosed your employer, Clinicas Del Camino Real, Inc. (Clinicas). There is insufficient evidence to show that any other sources of income or business positions should have also been disclosed.

VCMCC meeting minutes show that you were present for a VCMCC meeting on September 24, 2018. At this meeting, there was an informational presentation by Americas Health Plan (“AHP”) a business owned by Clinicas. No action was taken by VCMCC at this meeting or at a future meeting regarding the topic of the presentation. You did not recuse yourself, or leave the room, but since there was no governmental decision, the Enforcement Division cannot determine that you violated Section 87100.

VCMCC meeting minutes show that you were present for a VCMCC meeting on October 29, 2018. At this meeting, you recused yourself from another presentation by AHP, left the dias, and stayed in the audience. Again, no action was taken by VCMCC at this meeting or at a future

---

<sup>1</sup> 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.

<sup>2</sup> Section 87100.

<sup>3</sup> Section 87105.

meeting regarding the topic of the presentation, thus, the Enforcement Division cannot determine that you violated Section 87100. You recused yourself and left the room for all other VCMMCC governmental decisions reviewed that involved Clinicas and/or AHP.

Because there is insufficient evidence of a violation of the Act, the Enforcement Division is closing this case without further action. Should you have any questions regarding this letter, please feel free to contact me at (916) 322-5771 or [abreron@fppc.ca.gov](mailto:abreron@fppc.ca.gov).

Sincerely,

*Angela J. Brereton*

Angela J. Brereton

Assistant Chief, Enforcement Division