

**LAW OFFICE OF
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May 5, 2006

SENT BY FACSIMILE TO (805) 677-8711

**OFFICE OF CLERK
BOARD OF SUPERVISORS**

Jeffrey Stinnett,
Clerk of the Commission
Ventura County Campaign Finance Commission
800 S. Victoria Avenue
Ventura CA 93009

Re: Probable Cause Determination
Complaint No. 2006-02 (Bennett)

Dear Mr. Stinnett;

After careful consideration of Complaint No. 2006-02 filed by Carroll Dean Williams, Complainant, on April 25, 2006 alleging violations of Ventura County Campaign Finance Reform Ordinance No. 4322 Sections 1273 and 1275 against the Friends of Steve Bennett, Respondent, I find no probable cause exists for the following reasons:

The Ventura County Campaign Ethics Commission Operating Policies, revised March 2006, Article XII, provides, "Probable Cause means that the Complaint alleges facts, which if proven to be true, would be sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a violation of the Ventura County Campaign Finance Reform Ordinance has been committed and that the Respondent committed or caused the violation." Upon review of the complaint I find it fails to state any facts sufficient to constitute probable cause. At Page 2 of the Complaint under "Description of Facts," Complainant provides no description, whatsoever, of any facts constituting the alleged violation. Instead, bare reference is made to Sections 1273 and 1275 of "ORD NO. 4322", without any explanation of how, or whether, they have been violated.

Two documents are attached to the Complaint: a copy of a Campaign Disclosure Statement Summary Page filed by Friends of Steve Bennett covering the period 7/1/05 through 12/31/05, marked Exhibit "A" and an unmarked hand written document. The Complaint contains no allegations of violation(s) pertaining to Attachment "A" and, therefore, provides insufficient information to support a determination that probable cause exists. A similar finding is made regarding the unmarked document. Its first entry refers to activity dated "3/12/03" and is, therefore, outside the jurisdiction of the Commission because the Commission does not have jurisdiction over offenses occurring before April 10, 2003. The balance of the hand written document is illegible and, therefore, uncertain, ambiguous and unintelligible.

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Accordingly, the Complaint fails to state facts sufficient to constitute a finding of probable cause.

Respectfully submitted,



GEORGIANNA REGNIER,
Reviewing Commissioner

cc: Honorable William L. Peck,
Chair of the Commission