

CRAIG A. STEELE (State Bar No. 162523)  
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(213) 626-8484  
INVESTIGATOR

County of Ventura Elections Division - COMPLAINANTS

BEFORE THE COUNTY OF VENTURA CAMPAIGN FINANCE  
ETHICS COMMISSION

\_\_\_\_\_  
In the Matter of: ) Case No. P2012-08  
)  
Democratic Campaign Council of Ventura )  
County, Gary Crummitt - Treasurer )  
) **STIPULATION, DECISION AND**  
) **ORDER**  
)  
)  
RESPONDENTS )  
)

The appointed outside Investigator for the County of Ventura Campaign Finance Ethics Commission (the "Commission") in this matter, Craig Steele, and the Democratic Campaign Council of Ventura County and its treasurer Gary Crummitt (collectively, "Respondents") hereby agree that this Stipulation will be submitted for consideration by the Commission at its next scheduled meeting, and that the agreements herein are contingent upon the approval of this stipulation and the accompanying Decision and Order by the Commission.

The parties agree to enter into this Stipulation to finally resolve all factual and legal issues raised by the Complaint in Case No. P2012-08, and to reach a final disposition without the necessity of holding an administrative hearing to determine the liability (or lack thereof) of the Respondents. Upon approval of the Decision and Order by the Commission and compliance with the terms of this Stipulation by Respondents, the Commission shall take no further enforcement action against Respondents (either jointly or severally) relating to complaints or allegations regarding the facts and circumstances underlying Case No. P2012-08.

Contingent upon the Commission's approval of this stipulation and accompanying Decision and Order, Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights under the Ventura County Code, the Procedural Rules of the Commission and applicable State law including, without limitation, the issuance and receipt of an accusation, the right to personally appear at any administrative hearing held in this matter, to confront and cross-examine all witnesses testifying at the hearing, to

subpoena witnesses to testify at the hearing, and to have the Commission or an impartial administrative law judge hear the matter.

Complaint No. P2012-08 alleges that Respondents violated Section 1275(a) of the Ventura County Code ("the Ordinance") when Respondents made an independent expenditure in excess of \$1,000 supporting Steve Bennett in the 2012 primary election and failed to report that expenditure within 24 hours as required by the Ordinance. On May 30, 2012, Respondents distributed a mailer supporting ten candidates for various offices at different levels of government. Mr. Bennett was the only candidate featured on the mailer running in an election subject to the provisions of the Ordinance. Respondents did not file Ventura County Form 1275, Report of Independent Expenditures, within 24 hours of making the expenditure as required by Section 1275(a), nor did they file a copy of the mail piece with that report. Respondents appear to have reported the expenditure on California filings. After having been notified of the violation by the Elections Division, Respondents filed form 1275 and a copy of the mailer on November 23, 2012, after the election.

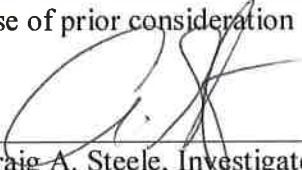
Respondents' treasurer has been cooperative in the investigation, admitted the filing error, and indicated he was unaware of the County's additional filing requirement.

As the full and final stipulated resolution of Case No. P2012-08, Respondents hereby agree to pay an administrative fine of \$1,000.00 to the County of Ventura. While less than the maximum possible fine that could be levied in this matter, the amount is justified by the following facts:

1. Respondents did not attempt to conceal the identity of its donors;
2. Respondents have no other enforcement history with the County of Ventura;
3. Respondents cooperated in the investigation and admitted the violation;
4. The Ventura County election was part of a larger expenditure.

Respondents hereby agree that if further consideration of this matter by the Commission becomes necessary, no Commission board members or staff, nor the Executive Director, shall be disqualified because of prior consideration of this Stipulation.

DATED: February 8, 2013

  
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Craig A. Steele, Investigator  
COUNTY OF VENTURA CAMPAIGN  
FINANCE ETHICS COMMISSION

DATED: 2/12/13

  
\_\_\_\_\_  
Gary Crummitt, Treasurer  
Respondents

**DECISION AND ORDER**  
**Case Nos. P2012-08**

The County of Ventura Campaign Finance Ethics Commission ("Commission") has considered the above Stipulation and a report from its investigator at its meeting on February 22, 2013. The Commission hereby approves the Stipulation and orders that, in accordance with the Stipulation, Respondents shall pay a stipulated fine of \$1,000.00 to the General Fund of the County of Ventura upon approval of this Decision and Order.

DATED: 2-22-13



Frank O. Sieh, Chair  
COUNTY OF VENTURA CAMPAIGN  
FINANCE ETHICS COMMISSION