



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811

March 20, 2020

Nora Pimentel  
Stadium Authority Secretary  
City of Santa Clara Stadium Authority  
[npimentel@santaclaraca.gov](mailto:npimentel@santaclaraca.gov)

**Re: Filing Officer Referrals COM-02222020-00564 (Guido); COM-02222020-00565 (Schoeb)  
COM-02222020-00566 (Ernstrom); COM-02222020-00567 (Oppelt)**

Dear Ms. Pimentel,

This letter is in response to the non-filer referrals you submitted to the Enforcement Division of the Fair Political Practices Commission regarding the above-referenced individuals. Your referral alleges that Mr. Guido, Mr. Schoeb, Ms. Ernstrom, and Mr. Oppelt have failed to file Statements of Economic Interests ("SEI") as "consultants" with your agency. However, there is no evidence to suggest that these individuals qualify as consultants and are required to file SEIs under the Political Reform Act (the "Act").<sup>1</sup>

Under Regulation 18329.5, when the Commission is not the code reviewing body for a conflict of interest code, the Commission will not render assistance regarding the interpretation of an agency's conflict of interest code or the application of that code to a specific individual unless specific criteria are met. Subsection(a)(3)(B) requires an agency to request a determination from the code reviewing body first. The code reviewing body for the Authority is the Santa Clara City Council.

If you disagree with the determination of the code reviewing body, you may request advice from the Commission's Legal Division. Because it is not clear whether the above-named individuals are required to file SEIs, we are rejecting these referrals at this time. If the City Council determines that these individuals must file SEIs, or you receive advice from the Commission's Legal Division that they must file SEIs, please re-refer the matters to the Enforcement Division if the individuals do not file in response to at least two written notifications. If you have any questions, please contact Ginny Lambing at [glambing@fppc.ca.gov](mailto:glambing@fppc.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Galena West".

Galena West  
Chief, Enforcement Division  
GW:gal

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<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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.