

COMPLAINT RECEIVED

The Enforcement Division of the Fair Political Practices Commission received the enclosed complaint, COM-11182025-03850, on 11/19/2025 8:18:00 AM. The information filed in the complaint is below and any attachments filed will be included.

The following individuals are the named parties in this complaint:

Rafael Ruthchild
Complainant

Bonta for CA Attorney General 2026
Respondent

Rob Bonta
Respondent

The Violations alleged are:

Improper Use of Campaign Funds
Use of Campaign Funds for Attorney's Fees (89514)

11/18/2025

Fair Political Practice Complaint on AG Rob Bonta's Legal Expenditures (Committee #1456428)

To Whom It May Concern,

During a recent news investigative piece on KCRA on 11/17/25 when Ashley Zavala questioned half a million dollars that Attorney General Rob Bonta's campaign spent on questionable legal fees for outside legal counsel (in addition to nearly \$50,000 Bonta spent on additional legal expenditures) Attorney General Rob Bonta's campaign made the following statement to the press:

- **"The AG wants to ensure that anyone who committed a crime is held accountable, so he engaged outside legal counsel to help his law enforcement partners pursue justice"**

<https://www.kcra.com/article/attorney-general-rob-bonta-campaign-legal-help-amid-bribery-probe/69463225>

Yet according to the FPPC Manual (Chapter 6.2), "attorneys' fees and other costs related to administrative, civil, **or criminal litigation may only be paid with campaign funds if the litigation is directly related to activities of the committee that are consistent with its primary objectives.**"

When questioned about these expenditures, the Bonta campaign stated the purpose of the expenses was not for activity consistent with the committee's primary objectives.

2/3/25	WILSON SONSINI GOODRICH & ROSATI, PC	PROFESSIONAL SERVICES (LEGAL, ACCOUNTING)	\$262,016.95
2/3/25	WILSON SONSINI GOODRICH & ROSATI, PC	PROFESSIONAL SERVICES (LEGAL, ACCOUNTING)	\$87,380.60
2/3/25	WILSON SONSINI GOODRICH & ROSATI, PC	PROFESSIONAL SERVICES (LEGAL, ACCOUNTING)	\$78,160.00
2/3/25	WILSON SONSINI GOODRICH & ROSATI, PC	PROFESSIONAL SERVICES (LEGAL, ACCOUNTING)	\$40,379.00
TOTAL LEGAL EXPENDITURES			\$467,936.55

Therefore, I am writing to ask the FPPC to investigate this half a million dollars in questionable legal expenses, based on the statement from Bonta's campaign.

By the Attorney General Bonta campaign's own admission, some or all of the \$467,936.55 in campaign funds spent were in violation of the Political Reform Act as according to Bonta's campaign some or all of these funds were spent on activities in conflict with what the FPPC deems as permissible, as they were not spent in a manner that was "directly related to activities of the committee" and not "consistent with the primary objectives" of the committee.

Based on what the Bonta campaign stated in writing and on the record, the purpose of some or all of these legal expenses was for another purpose, and not for his committee, but because: **"The AG wants to ensure that anyone who committed a crime is held accountable, so he engaged outside legal counsel** to help his law enforcement partners pursue justice." This conflicts with the FPPC Manual and I respectfully ask the FPPC to investigate and determine how much of the half a million dollars was spent on legal activity that may have violated ethics laws.

Respectfully,

Rafael Ruthchild



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

November 19, 2025

Bonta for CA Attorney General 2026
Rob Bonta, Candidate
Via email: bontaag2026@deaneandcompany.com

Re: FPPC Complaint No. COM-11182025-03850; Bonta for CA Attorney General 2026, Rob Bonta

Dear Rob Bonta and Committee:

The Enforcement Division of the Fair Political Practices Commission has received the enclosed sworn complaint against you. It appears the complainant is alleging you have violated the Political Reform Act's¹ campaign finance provisions². The complaint and any attachments filed are enclosed. The complaint was filed against all those listed above.

The person filing the Complaint is:
Rafael Ruthchild

The violations alleged are:

Improper Use of Campaign Funds
Use of Campaign Funds for Attorney's Fees (89514)

At this time, we have not made any determination about the allegation(s) made in the complaint. Within 14 days, the complainant will be notified of our intent to:

- investigate the allegations of the complaint;
- refer the complaint to another governmental agency;
- take no action on the complaint because, on the basis of the information provided, the Commission does not appear to have jurisdiction to investigate; or
- take no action on the complaint because the allegations of the complaint do not warrant the Commission's further action.

A copy of that letter will be forwarded to you. If you have any comments on the allegation(s), your comments must be submitted in writing directed to Shelby Pearce at

¹ 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.

² Please note that under the Act, you are required to retain accounts, records, bills, receipts and other original source documentation. These records should be readily available for any audit or investigation conducted by the Fair Political Practices Commission. (GC §§ 84104, 86110 and 90003; Regulations 18401, 18401.1.)

the address shown above or by email to spearce@fppc.ca.gov. Please include the complaint number referenced above in your response.

Sincerely,

Kendall L.D. Bonebrake

Kendall L.D. Bonebrake
Chief, Enforcement Division

KLDB: sp

11/18/2025

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