



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax (916) 322-0886

January 26, 2012

✓ Mr. Robert Brown

**REDACTED**

**RE: Warning Letter  
FPPC No. 12/010; Robert Brown**

Dear Mr. Brown:

The Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act ("Act"),<sup>1</sup> found in Government Code section 81000, et seq. This letter is in response to a complaint filed against you that alleged you violated the disclosure and conflict of interest provisions of the Act. We are closing this matter with a warning letter.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you failed to list the Lake County Bail Bonds and the Colusa County Bail Bonds as dbas of the Rob Brown Bail Bonds, and that you failed to disclose an interest in real property located at 8407 Bottle Rock Road, Kelseyville, Ca.

As a county supervisor, whose position is listed in Government Code section 87200, you have an obligation to disclose all investments, interests in real property, and sources of income located in or doing business in your jurisdiction. (Sections 87206 through 87210.)

Your actions violated the Act because while you reported your investment in the Rob Brown Bail Bonds, you failed to disclose the two other bail bond companies that were doing business as Lake County Bail Bonds and Colusa County Bail Bonds through the Rob Brown Bail Bonds on your statement of economic interests. You also had an obligation to disclose your interest in 8407 Bottle Rock Road when the County Planning Department split your existing property on 8107 Bottle Rock Road into two parcels.

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation. However, because you filed amendments to disclose the dbas and your interest in the property located on Bottle Rock Road, and the fact that you do not have an enforcement history, we are closing this matter with a warning letter.

A warning letter is an FPPC case resolution without administrative prosecution or fine. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Fair Political Practices Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the FPPC's website ten (10) days from the date of this letter.

Please feel free to contact me with any questions you may have regarding this letter.

Sincerely,

**REDACTED**

Gary S. Winuk  
Chief, Enforcement Division