FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

July 15, 2014

Pam O'Connor
Alfredo Caravelli
Re-elect Councilmember Pam O'Connor 2010
[redacted]

Warning Letter Re: FPPC No. 11/426, Re-elect Councilmember Pam O'Connor

Dear Ms. O'Connor and Mr. Caravelli:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act"), found in Government Code section 81000, et seq. This letter comes as the result of a referral to the FPPC from the City of Santa Monica, Department of Records and Election Services. The FPPC has completed its investigation and determined that you failed to timely disclose employer and/or occupational information for persons who made campaign contributions of $100 or more to your campaign committee, Re-elect Councilmember Pam O'Connor 2010.

Section 84211, subdivision (f) requires a candidate and committee to disclose on its campaign statements the name, address, occupation, and employer for every individual who contributed one hundred dollars or more to the campaign during the statement period. On your pre-election statement for the October 1, 2010 through October 16, 2010 statement period you failed to timely disclose the occupation and employer of four contributors by the October 21, 2010 filing deadline. On April 27, 2011, you filed an amended statement disclosing the occupation and employer information for all these individuals. On your semi-annual statement for the October 17, 2010 through December 31, 2010 statement period you failed to timely disclose occupation and employer information for fourteen contributors. On May 2 and 4, 2011 you filed amended statements providing additional contributor occupation and employer information.

Despite your violation of the Act, mitigating factors exist such that the FPPC has decided to issue you a warning letter rather than impose a fine. The contributors for whom you did not timely disclose occupation and employer information represented a relatively small percentage of the total number of contributions that you received and properly reported. Also, you filed amended statements disclosing previously undisclosed contributor occupational and employer information. Further, it does not appear your initial failure to disclose occupational and employer information was intended to conceal the information or deceive the public.

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.

A warning letter is an FPPC case resolution without administrative prosecution or fine. 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. 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.

If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact me at (916) 323-6302 with any questions you may have regarding this letter.

Sincerely,

Dave Bainbridge
Senior Commission Counsel
Enforcement Division

cc: Sarah Gorman
Santa Monica City Clerk
1685 Main Street, Room 102
Santa Monica, CA 90407