



## FAIR POLITICAL PRACTICES COMMISSION

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

(916) 322-5660 • Fax (916) 322-0886

September 24, 2013

Robin Bennett

# REDACTED

Re: Advisory Letter

**FPPC No. 12/081: Robin Bennett, Rachel Dunn-Black, M.D., Dena Finley, GH Ranch, GH Ranch, LLC, Hanna Bros. Ranch, Inc., Hanna Brothers, LLC, Sherri Hanna, Cheryl Hayden.**

Dear Ms. Bennett:

The Fair Political Practices Commission ("Commission") enforces the provisions of the Political Reform Act (the "Act")<sup>1</sup>. The Commission received an anonymous complaint alleging that individuals (known and unknown) in and around Siskiyou County, CA, organized a campaign opposing Measure E, a school bond measure in Siskiyou County in the November 2, 2010 election, and qualified as a committee under the Act, but failed to file any campaign statements or identify the sender in mass mailings and advertisements. Included with the complaint was a postcard mailer opposing Measure E which did not identify the sender.

The Act requires all candidates and committees to include the name, street address, and city of the sender on all mailings in which there are over two hundred substantially similar pieces of mail sent within a calendar month. (Sections 82041.5 and 84305; Regulation 18435.) The Act defines a committee as any person or combination of persons who either: 1) receives contributions totaling one thousand dollars (\$1,000) or more in a calendar year; 2) makes independent expenditures totaling one thousand dollars (\$1,000) or more in a calendar year; or 3) makes contributions totaling ten thousand dollars (\$10,000) or more in a calendar year to or at the behest of candidates or committees. (Section 82013.) Committees are required to disclose all campaign activity in periodic campaign statements. (Section 84200, et seq.)

Our investigation revealed that you paid \$122.43 to design and print the postcard included with the anonymous complaint, and 1,500 copies of this postcard were ordered and sent to Siskiyou residents in the days leading up to the November 2, 2010 election. As stated previously, no sender identification was included on these postcards.

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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.

However, our investigation found insufficient evidence to establish that you qualified as a "committee" under the Act who was subject to the Act's campaign disclosure and mass mailing sender identification requirements. Therefore, we have closed our file in this matter.

**Please be advised** that should you, either acting alone or in concert with other individuals or entities, receive or spend \$1,000 or more for campaign activity in the future, you will qualify as a committee under the Act, and you will be subject to all campaign disclosure and reporting requirements under the Act, including disclosure requirements for mailings and advertisements. Your failure to comply with the provisions of the Political Reform Act in the future could result in an enforcement action, and may result in monetary penalties of up to \$5,000 for each violation.

If you have any questions regarding this matter, please feel free to contact me at 916-322-5660.

Sincerely,

**REDACTED**

Angela J. Brereton  
Senior Commission Counsel  
Enforcement Division