



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2529

(916) 322-5660 • Fax (916) 322-3856

November 6, 2012

Susan Brooks

**REDACTED**

✓Thomas Long

**REDACTED**

Brian Campbell

**REDACTED**

Anthony Misetich

**REDACTED**

**Re: FPPC No. 11/002, Save Our City III, et al.**

Dear Ms. Brooks, Mr. Campbell, Mr. Long, and Mr. Misetich:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act"),<sup>1</sup> found in Government Code section 81000, and following. This letter is in response to a referral from the Los Angeles County District Attorney's office, which received a complaint against you alleging violations of the Act's campaign reporting provisions.

After a full investigation, the Enforcement Division has determined that you did not violate the Act under the facts and circumstances of this case. In 2010, each of you paid for and recorded a "robocall" in opposition to Measure P. Our investigation revealed your expenditures for these calls were independent expenditures pursuant to Section 82031, and thus, Save Our City III was not required to disclose the expenditures for your robocalls on its campaign statements. Additionally, you were not required to disclose the name of Save Our City III during the robocalls. Further, you were not required to disclose these expenditures on campaign statements because these expenditures were made with personal, not campaign, funds, and none of you reached the thresholds to become either an independent expenditure committee or a major donor committee. Therefore, we have closed our file in this matter.

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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.

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