



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811 • (916) 322-5660

Fourth Quarter Update 2025

Campaign Reporting, Advertising Disclosure, and Use of Campaign Funds

Regulations adopted by the Commission.

The following are regulatory changes approved by the Commission during the past quarter concerning campaign reporting, advertising disclosure, and use of campaign funds. To receive updates for all regulations before the Commission, please sign up for our [mailing list here](#).

18404. Termination of Candidate and Section 82013 Committee Filing Requirements. (amend), effective 12/17/25

18404.1. Termination and Reopening of Committees. (repeal), effective 12/17/25

18404.1. Termination of Section 82013(a) Committees, 24-Month Mandatory Terminations, and Accepting Refunds after Termination. (adopt), effective 12/17/25

18404.3. Reopening a Terminated Section 82013(a) Committee, effective 12/17/25

Advice Letters

The following are advice letters issued by the Commission's Legal Division during the past quarter concerning questions about campaign reporting, advertising disclosure, and use of campaign funds. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Campaign

Max Kanin - A-25-129

A candidate under investigation by state licensing board for an ethics violation that occurred during an earlier failed campaign for state office may use campaign funds from his current committee for elected office to pay the attorney fees and costs related to the investigation as the investigation is directly related to the activities of his committee and consistent with its primary objectives, electing the candidate to state office.

Dan Miller - A-25-157

In connection with a January 27, 2026, special election in Marin County, candidates and committees may use a filing schedule that combines the semi-annual campaign statement with the second pre-election statement. The combined statement will be due on January 15, 2026, covering the period from December 14, 2025, through January 10, 2026.

Section 84308

Andrea Sorce - [A-25-109](#)

Under Section 84308, the city mayor may take part in decisions related to a community facilities district tax affecting a specific geographic area, notwithstanding a contribution of \$500 or less in the previous 12 months from a property owner within the district. Section 84308 does not apply to contributions of \$500 or less, so long as the decisions occur after January 1, 2025.

Additionally, Section 84308 and the Act do not prohibit the mayor from taking part in decisions regarding ongoing litigation merely because opposing counsel represented the mayor's spouse in another case against the city or because the firm's managing partner contributed \$100 to the mayor's campaign in 2024. Section 84308 does not apply to a \$100 contribution. Moreover, while the mayor has a source of income interest in the payor of the settlement, the source of the settlement is the city, not the law firm.

Commission Opinions

None.

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter involving violations of the Act's campaign reporting, advertising disclosure, and use of campaign funds provisions. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

Campaign Late Filer/Reporter

[In the Matter of New Car Dealers Association Issues PAC and Thomas Hiltachk; FPPC No. 22/928.](#)

Staff: Bridgette Castillo, Senior Commission Counsel. Respondents were represented by Ashlee N. Titus of Bell, McAndrews & Hiltachk, LLP. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. New Car Dealer's Association Issues PAC is a state general purpose committee that became a state primarily formed ballot measure committee at the end of September 2020. Thomas Hiltachk served as the Committee's treasurer. The Committee and Hiltachk failed to file an amended Statement of Organization to re-designate the Committee to a primarily formed committee and properly amend the name of the Committee, in violation of Government Code Sections 84103 and 84107 (1 count). **Fine: \$2,000.**

[In the Matter of Lisa Davis CUSD School Board 2020 and Lisa Davis; FPPC No. 21/123.](#)

Staff: Jonathan Rivera, Commission Counsel. Lisa Davis was a successful candidate for the Capistrano Unified School District in the November 3, 2020 General Election. Lisa Davis CUSD School Board 2020 was Davis' candidate-controlled committee. The Committee and Davis failed to timely file one pre-election campaign statement, in violation of Government Code Sections 84200.5 and 84200.8 (1 count) and five 24-Hour Reports, in violation of Government Code

Section 84203 (5 counts). The Committee and Davis also failed to timely report the occupation and employer of contributors on one pre-election campaign statement and expenditures on a semi-annual campaign statement, in violation of Government Code Section 84211 (2 counts). **Fine: \$2,586 (Tiers One and Two).**

In the Matter of Friends of Fred Docdocil for Carson City Council 2022, Fred Docdocil, and Jesus Alex Cainglet; FPCC No. 23/310. Staff: Jaleena Evans, Commission Counsel. Fred Docdocil was an unsuccessful candidate for Carson City Council in the November 8, 2022 General Election. Friends of Fred Docdocil for Carson City Council 2022 was Docdocil's candidate-controlled committee. Jesus Alex Cainglet served as the committee's treasurer. The Committee and Cainglet failed to timely file an amended Statement of Organization upon qualifying as a committee, in violation of Government Code Section 84101 (1 count), failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count), failed to timely file six 24-Hour Reports, in violation of Government Code Section 84203 (6 counts), failed to timely file three semi-annual campaign statements, in violation of Government Code Section 84200 (3 counts), and failed to timely report a contribution on a pre-election campaign statement, in violation of Government Code Section 84211 (1 count). **Fine: \$3,748 (Tiers One and Two).**

Advertisements

In the Matter of Kevin Kugley for Beverly Hills City Council 2022 and Kevin Kugley; FPCC No. 22/484. Staff: Laura Columbel, Commission Counsel and Kaitlin Osborn, Special Investigator. Kevin Kugley was an unsuccessful candidate in the June 7, 2022 Primary Election. Kevin Kugley for Beverly Hills City Council 2022 was Kugley's candidate-controlled committee. The Committee and Kugley failed to include the proper advertisement disclosure in an email, in violation of Government Code Section 84305 (1 count). **Fine: \$406 (Tier One).**

Campaign Bank Account

In the Matter of Antonio Lopez and Committee to Elect Antonio Lopez for East Palo Alto City Council 2020; FPCC No. 21/266. Staff: Jenna C. Rinehart, Senior Commission Counsel, and Roone Petersen, Special Investigator. Antonio Lopez was a successful candidate for East Palo Alto City Council in the November 3, 2020 General Election. Committee to Elect Antonio Lopez for East Palo Alto City Council 2020 was Lopez's candidate-controlled committee. The Committee and Lopez failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts), a terminating Statement of Organization, in violation of Government Code Section 84103 (1 count), and three Form 470s, in violation of Government Code Section 84206 (3 counts). Additionally, the Committee and Lopez failed to timely disclose certain expenditures on two pre-election campaign statements and one semi-annual campaign statement, in violation of Government Code Section 84211 (3 counts), made expenditures in cash of \$100 or more, in violation of Government Code Section 84300 (2 counts), failed to process \$4,500 through the campaign bank account, in violation of Government Code Section 85201 (1 count), and failed to maintain adequate campaign records, in violation of Government Code Section 84104 (1 count). **Fine: \$1,263 (Tiers One & Two).**

Mass Mailings at Public Expense

In the Matter of County of San Benito; FPPC No. 23/006. Staff: Alex Rose, Senior Commission Counsel and Kristin Hamilton, Special Investigator. The County of San Benito is represented by Gregory Priamos of Prentice | Long, PC. The County of San Benito sent prohibited campaign-related mass mailings at public expense, in violation of Government Code Section 89001 and Regulation 18901.1 (1 count), failed to include the proper advertising disclosure on mailers, in violation of Government Code Sections 84502 and 84504.2 (1 count), failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200, subdivision (b) (1 count), and failed to timely file one 24-Hour Report, in violation of Government Code Section 84204 (1 count). **Fine: \$18,000.**

In the Matter of Oceanside Unified School District; FPPC No. 24/1211. Staff: Alex Rose, Senior Commission Counsel and Victoria Cichy, Special Investigator. Oceanside Unified School District (“OUSD”) is represented by Jonathan Salt of F3 Law. OUSD is a public school district based in San Diego County. OUSD sent a two-sided newsletter to every resident of Oceanside that featured each of the eight OUSD Board of Trustees members. Thus, OUSD sent a prohibited mass mailing at public expense, in violation of Government Code Sections 89001 and 89002 (1 count). **Fine: \$4,000.**

Legislation

None.