



FAIR POLITICAL PRACTICES COMMISSION

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

January 6, 2015

Keith Snow



Re: Warning Letter ✓
FPPC No. 14/1288; Keith Snow for Mayor 2014; Keith Snow

Dear Mr. Snow:

The Fair Political Practices Commission (the “Commission”) enforces the provisions of the Political Reform Act (the “Act”) found in Government Code section 81000, and following.¹ As you know, we received a complaint alleging that you and the Keith Snow for Mayor 2014 committee violated the campaign reporting provisions of the Act, when the committee failed to report contributions it received.

You reported making over \$4,500 in expenditures for your 2014 mayoral campaign, but failed to disclose who the donors to your campaign were. The manner in which the campaign statements were filed, gave the impression the committee was spending funds without disclosing who provided the committee with those funds.

The Act requires all contributions or loans made to the candidate, and any personal funds which will be utilized to promote the election of the candidate, to be deposited in the campaign account prior to making any expenditure. (Section 85201(d).) Furthermore, you are required to disclose and itemize all contributions received, including personal funds, of \$100 or more. (Section 84211(f)(5).) Therefore, the personal funds of the candidate used for campaign purposes, must first be deposited into a campaign bank account prior to spending it on the campaign, and must report those funds as either contributions or loans.

Your actions violated the Act because you failed to disclose your personal funds as contributions to your campaign. Since the vendors were disclosed, albeit in the wrong format, and the fact that you do not have an enforcement history, we are closing this matter with a warning letter.

¹ 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.

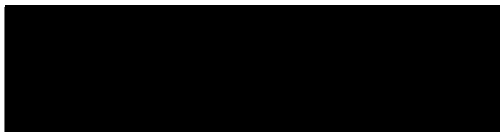
This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

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.

The Commission publishes forms and manuals to facilitate compliance with the Act. 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. Please also visit our website at www.fppc.ca.gov where you will find forms available to be completed interactively.

If you have questions regarding this matter, please contact Teri Rindahl at (916) 327-2018.

Sincerely,

A large black rectangular redaction box covering the signature area.

Gary S. Winuk, Chief
Enforcement Division

GSW/tr