STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

October 29, 2020

Colleen Rozatti
Rozatti for City Treasurer 2018
Via Email: [redacted]

Warning Letter Re: FPPC No. 2020-00850; Rozatti for City Treasurer 2018 and Colleen Rozatti

Dear Ms. Rozatti:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").[1] As you are aware, the Enforcement Division received a sworn complaint against you and your committee Rozatti for West Covina City Council 2020 (the "2020 Committee") alleging that you violated the advertisement and campaign disclosure provisions of the Act.

The Enforcement Division has completed its review and found that the 2020 Committee was not required to include a disclaimer on its yard signs and flyers. The Enforcement Division also found that the 2020 Committee filed two pre-election campaign statements to disclose its activity. However, your committee Rozatti for City Treasurer 2018 (the "2018 Committee") failed to include the required disclosure on its Facebook page and failed to timely file the first pre-election campaign statement for the reporting period ending on September 19, 2020.

Under the Act, social media pages made by candidate controlled committees shall include the disclosure "Ad paid for by" followed by the name of the committee in a contrasting color that is easily readable by the average viewer and in no less than 10-point font on the cover or header photo of the committee's profile, landing page, or similar location.[2]

If a candidate or elected officer controls more than one committee for the purpose of election to office, including committees established for a different elective office, the candidate or elected officer shall file campaign statements for each of these committees on the dates the candidate or elected officer is required to file pre-election statements under Sections 84200.5 and 84200.8 in connection with his or her election to office.[3]

---

[1] The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

[2] Sections 84504.4, subd. (b) and 84504.3, subd. (h).

[3] Regulation 18405.

You and the 2018 Committee violated the Act because you published a Facebook page that did not include the required "Ad paid for by" and committee name disclosure on the cover or header photo. You and the 2018 Committee also violated the Act by failing to file the first pre-election campaign statement for the reporting period ending on September 19, 2020 by the September 24, 2020 deadline. However, the 2018 Committee added the required disclosure in multiple locations on its Facebook page after being contacted by the Enforcement Division. The 2018 Committee also filed the outstanding pre-election campaign statement after being contacted by the Enforcement Division and reported a low level of activity. The 2020 Committee opened in connection with the November 3, 2020 General Election filed two pre-election campaign statements to disclose its activity. Additionally, neither you nor the 2018 Committee have a prior history of violating the Act. For these reasons, the Enforcement Division is closing this case with a warning letter.

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 Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. 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 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 Enforcement Division 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 Commission'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 Dominika Wojenska at dwojenska@fppc.ca.gov or (916) 322-2043 with any questions you may have regarding this letter.

Sincerely,

GWest

Galena West, Chief
Enforcement Division

GW/dw
cc: Jerri Potras