



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

October 13, 2022

Warren Lieberman for Belmont Mayor 2022  
Warren Lieberman  
Robert Ledoux, Treasurer  
[REDACTED]

**Warning Letter Re: FPPC Case No. 2022-00731; Warren Lieberman for Belmont Mayor 2022, Lieberman, Ledoux**

Dear Mr. Lieberman, Mr. Ledoux, and Committee:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This letter is in response to an anonymous complaint alleging that you violated the Act’s campaign reporting provisions. The Enforcement Division has completed its review of this matter and found that the Committee failed to timely report expenditures made by an agent (“subvendor payments”) on its first pre-election campaign statement for the July 1, 2022 through September 24, 2022 reporting period.

The Act requires committees to disclose specific information on their campaign statements. Specifically, the Act requires that for expenditures of \$100 or more, the committee must report the full name of each person to whom an expenditure is made, as well as the person’s street address, the amount of the expenditure, and a brief description of the expenditure.<sup>2</sup> An expenditure also includes payments made by an agent or independent contractor, commonly referred to as “subvendor payments,” of \$500 or more.<sup>3</sup> An expenditure is made on the date the payment is made or on the date consideration is received.<sup>4</sup>

You violated the Act because you failed to fully report subvendor payments on the pre-election campaign statement for the reporting period of July 1, 2022 through September 24, 2022. The initial campaign statement disclosed a payment of \$14,086 to AMF Strategies on Schedule E without corresponding subvendor disclosure. However, mitigating evidence exists such that the Enforcement Division has decided to close this case with a warning letter rather than a fine.

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<sup>1</sup> 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.

<sup>2</sup> §84211(i)

<sup>3</sup> §84211(k)

<sup>4</sup> §82025(a)

Immediately after you were contacted by the Enforcement Division, and well before the November 8, 2022 election, you filed an amendment to the first pre-election campaign statement disclosing subvendor activity totaling \$11,739 on Schedule G of the Form 460. Additionally, you explained that you inadvertently omitted Schedule G from the timely filed first pre-election campaign statement. And finally, you have no prior history of violating the Act.

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 your client with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If your clients wish to avail themselves of these proceedings by requesting that this 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.

Please feel free to contact Tara Stock at [tstock@fppc.ca.gov](mailto:tstock@fppc.ca.gov) or (916) 322-8241 with any questions you may have regarding this letter.

Sincerely,

*Angela J. Brereton*

Angela J. Brereton, Chief  
Enforcement Division

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