



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

December 21, 2021

Committee to Support the Recall of District Attorney George Gascon
Kelly Lawler, Treasurer
20555 Devonshire Street, Box 204
Chatsworth, CA 91311
Via email: kellylawler@TheKALGroup.com

Warning Letter Re: FPPC No. 2021-01153; Committee to Support the Recall of District Attorney George Gascon

Dear Committee to Support the Recall of District Attorney George Gascon & Ms. Lawler:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ As you know, the Enforcement Division received a complaint against the Committee to Support the Recall of District Attorney George Gascon (the “Committee”) which alleged the Committee’s website did not contain the correct advertising disclosure.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that the Committee filed its initial Statement of Organization (Form 410) on September 2, 2021, and a Form 410 amendment on November 2, 2021, which updated the name of the Committee. However the Committee’s website disclosure still displayed the original name of the Committee and was not updated.

The Act provides that an internet website paid for by a committee, other than a political party committee or a candidate-controlled committee established for an elective office of the controlling candidate, shall include the words “Paid for by” followed by the name of the committee as it appears on the most recent Statement of Organization filed pursuant to Section 84101.²

The Committee violated the Act by failing to include on its website the full committee name as it appears on the most recently filed Statement of Organization. However, it was clear that the Committee paid for the website in question, so the violation resulted in minimal public harm.

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 Section 84504.3(d) and 84502(c)

Additionally, the Committee immediately corrected the disclosure after being contacted by the Enforcement Division. And finally, the Committee does not have a prior Enforcement history. For these reasons, the Enforcement Division is closing this case with a warning letter rather than issuing a fine.

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 Ginny Lambing at 916-322-8064 or glambing@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

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