



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

May 17, 2022

Lynn Compton for Supervisor 2022

Lynn Compton

Trent Benedetti, Treasurer



Warning Letter Re: FPPC No. 22/369, Lynn Compton for Supervisor 2022, Compton, Benedetti

Dear Committee, Ms. Compton, and Mr. Benedetti:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ This letter is in response to an anonymous complaint filed against your committee. The complaint alleged that you failed to properly report contributions on the semi-annual campaign statement for the reporting period of July 1, 2021 through December 31, 2021.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to correctly attribute some of the committee's received contributions to single individuals on Schedule A of the committee's July 1, 2021 through December 31, 2021 semi-annual campaign statement. Instead, it appears you attributed single contributions to married couples.

The Act requires candidate-controlled committees to file two pre-election campaign statements prior to the applicable election, and semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.² The obligation to file semi-annual campaign statements continues until the candidate or treasurer terminates the committee. Controlling candidates and committee treasurers are jointly and severally liable for violations by the committee.³ Additionally, the Act requires that all committees disclose the total amount of contributions received during the reporting period. For contributions received of \$100 or more specific information must be disclosed, including the contributor's name and address, and if the contributor is an individual, the occupation and

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 84200 and 84200.5

³ Sections 83116.5 and 91006

employer.⁴ If a contribution is made from a joint checking account, the contribution must be attributed to the individual who signed the check, unless an accompanying document directs otherwise.⁵

You and the committee violated the Act by failing to correctly attribute some contributions received from joint checking accounts to single individuals on the committee's campaign statements. Instead, the contributions were reported as from both individuals listed on the checks. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine because, while the contributions were not correctly attributed to the individual who signed the check, the contributor's identities were disclosed. Additionally, the contributors for whom you did not correctly attribute the contributions represented a relatively small percentage of the total number of contributions received by the Committee that were properly reported. Furthermore, it does not appear that your failure to correctly attribute the contributions was intended to deceive the public. Lastly, you have now filed amended campaign statements for the committee, which correctly attribute the contributions to single individuals.

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.

⁴ Section 84211(a).

⁵ Regulation 18533.

Please feel free to contact Amber Rodriguez at (916) 322-1198 or arodriguez@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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