



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

July 22, 2022

Ventura County Lincoln Club
Thomas Ellis, Treasurer



Warning Letter Re: FPPC No. 2022-00508; Ventura County Lincoln Club

Dear Committee and Mr. Ellis:

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 referral from the County of Ventura alleging that you failed to timely file the semi-annual campaign statements for the periods covering January 1, 2021 through June 30, 2021, and 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 file the semi-annual campaign statement for the reporting period of January 1, 2021 through June 30, 2021, by the August 2, 2021 deadline.² We also found that you failed to file the semi-annual campaign statement for the reporting period of July 1, 2021 through December 31, 2021, by the January 31, 2022 deadline.

The Act requires committees to file 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 31.³ In addition, depending on the committee’s activity in connection with an election, the committee may also be required to file two pre-election campaign statements prior to the applicable election.⁴ The obligation to file semi-annual campaign statements continues until the treasurer terminates the committee.

Your actions violated the Act because you failed to timely file the above referenced semi-annual campaign statements by the applicable deadlines. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine because the missing campaign statements were filed immediately after you were contacted by the Enforcement Division, minimal activity was disclosed on the campaign statements, and you have no prior history of violating this section of the Act within the last five years.

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 July 31, 2021 fell on a Saturday so the deadline was extended to the next business day

³ Section 84200.

⁴ Section 84200.5.

Please note that while the Enforcement Division is closing this matter without a fine, your filing officer, the Ventura County Clerk-Recorder/Registrar of Voters, may assess late filing penalties.

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. 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. Please feel free to contact Ginny Brown at gbrown@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

AJB:gab

cc: Christi Hill o/b/o Ventura County Clerk-Recorder/Registrar of Voters