



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

July 10, 2023

Jenny McAdams for City Council 2022
Jenny McAdams, Candidate
Patti Worth, Treasurer
[REDACTED]

**Warning Letter Re: FPPC Case No. 2022-00748; Jenny McAdams for City Council 2022;
Jenny McAdams; Patti Worth**

Dear Ms. McAdams, Ms. Worth, & Jenny McAdams for City Council 2022:

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 a complaint filed against your committee: Jenny McAdams for City Council 2022 (“the Committee”), that alleged you violated the Act’s campaign reporting provisions. The Enforcement Division has completed its review of this matter and found that you and the Committee failed to properly report a loan made by Jenny McAdams to the committee on campaign statements for the years 2021 and 2022.

The Act requires committees to disclose precise information on their campaign statements. Specifically, the Act requires that a campaign statement include all contributions received during the period.² A loan is considered a “contribution” under the Act.³

You and the Committee violated the Act because you failed to report an \$1,800 loan made by Jenny McAdams to the Committee on the July 1, 2021 through December 31, 2021 campaign statement; and you and the Committee failed to reporting the outstanding balance of the loan on all subsequent campaign statements. However, mitigating evidence exists such that the Enforcement Division has elected to close this case with a warning letter rather than issue a fine: the Committee had minimal activity during the stated periods; Ms. McAdams did not seek re-election in the 2022 election and the Committee has since terminated; and finally, the Committee and Ms. McAdams do not have a prior history of violating the Act.

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 84211

³ Section 82015

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.

If your clients need forms or a manual, or guidance regarding their 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 Brown at gbrown@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Christopher B. Burton

Christopher B. Burton, Acting Chief
Enforcement Division

CBB:gab

cc: Daniel Miller (sworn complainant)