



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

December 15, 2022

Friends for Measure Y
Guy R. Walker, Treasurer
[REDACTED]

Warning Letter: FPPC No. 2022-01030, Friends for Measure Y; Walker

Dear Committee and Mr. Walker:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ As you are aware, in response to the Enforcement Division’s pre-election outreach program, we were made aware by Santa Barbara County that you failed to timely file the pre-election campaign statements in connection with the November 8, 2022 election. The Enforcement Division has completed its review of the facts in this case and found that you failed to timely file the pre-election campaign statements in connection with the November 8, 2022 General Election.

The Act requires a committee primarily formed to support or oppose a ballot measure to file two pre-election campaign statements prior to the applicable election.² Additionally, the Act requires primarily formed ballot measure committees that receive a contribution(s) totaling \$1,000 or more from a single source within 90 days before the election, or on the date of the election, to file a 24-hour report (Form 497) within 24 hours of receipt of the contribution.³

You violated the Act by failing to file the first pre-election campaign statement by the September 29, 2022 deadline and failing to file the second pre-election campaign statement by the October 27, 2022 deadline. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine for the following reasons: you were referred as part of the pre-election outreach program; the pre-election statements were filed after you were contacted by the Enforcement Division and before the election; the required Form 497s were timely filed; it appears you had a low level of experience with the Act; and you have no history of violating the Act. Please note that while the Enforcement Division is closing this matter without a fine, your filing officer, Santa Barbara County, may assess late filing penalties.

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 84200.5.

³ Sections 82036 and 84203.

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 have any questions regarding this letter, please contact Tara Stock at tstock@fppc.ca.gov or (916) 322-8241.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

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