



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

September 6, 2023

Operating Engineers Local 3
c/o Kelly Liang
Olson Remcho
555 Capitol Mall, Suite 400
Sacramento, CA 95814
Via email at: kliang@olsonremcho.com

RE: Advisory Letter: Operating Engineers Local 3; FPPC No. 2019-00224

Dear Kelly Liang,

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 AdWatch submission alleging Operating Engineers Local 3 (“OE3”) violated the Act’s advertisement disclosure provisions when OE3 included a webpage on its website opposing Proposition 6, which appeared on the November 6, 2018 General Election ballot.

The Enforcement Division completed its investigation and has decided to close its file on this matter without further action because the allegations have been disproven. Because there was no cost associated with adding the webpage opposing Proposition 6 to OE3’s website, the webpage opposing Proposition 6 was not an advertisement under the law in effect in 2018. Therefore, the webpage was not subject to the Act’s advertisement disclosure provisions, and we are closing this matter with this advisory letter.

Although we are closing our file, please be advised of the provisions in the Act and regulations regarding advertisement disclosures, particularly, Regulation 18450.2, which became effective January 23, 2020. If you need additional guidance, you may contact the Commission’s Advice team by sending an email to advice@fppc.ca.gov. There is also information pertaining to advertisement disclosures available on the Commission’s website, www.fppc.ca.gov.

Should you have any questions regarding this letter, please feel free to contact me at (916) 322-5772 (voicemail) or mcorona@fppc.ca.gov

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 18104 through 18998 of Title 2 of the California Code of Regulations.

Sincerely,

Marissa Corona

Marissa Corona
Commission Counsel
Enforcement Division