



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

September 22, 2023

Robert Shaw  
[REDACTED]

Ted Stimpfel  
[REDACTED]

**No Action Closure Letter Re: FPPC No. 2019-00209; Robert Shaw and Ted Stimpfel**

Dear Robert Shaw and Ted Stimpfel:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This letter is in response to a commission-initiated complaint regarding potential violations of the campaign disclosure and advertisement disclaimer provisions of the Act. We are closing this matter without further action as there is insufficient evidence to support a finding that you violated the Act.

The Enforcement Division’s investigation did not obtain sufficient evidence to determine whether you qualified as a committee under the Act, and whether disclosures were required on advertisements. Therefore, in conjunction with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which requires the Enforcement Division to take all appropriate actions within their discretion to decrease the Division’s annual carryover caseload, the Enforcement Division is closing this case without action.<sup>2</sup> Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.<sup>3</sup> This resolution may not be used as a comparable case for other enforcement matters.<sup>4</sup>

Should you have any questions regarding this letter, please feel free to contact me at 916-322-5771 or [abreron@fppc.ca.gov](mailto:abreron@fppc.ca.gov).

Sincerely,

*Angela J. Brereton*

Angela J. Brereton  
Assistant Chief  
Enforcement Division

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<sup>1</sup> 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.

<sup>2</sup> <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

<sup>3</sup> Regulations 18360.1 and 18360.3.

<sup>4</sup> See Regulation 18361.5, subdivision (e)(3).