



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

October 2, 2023

Tami Seigal
Tami Seigal Rocklin School Board 2018



Warning Letter Re: FPPC No. 2019-01078; Tami Seigal Rocklin School Board 2018 and Tami Seigal

Dear Tami Seigal and Committee:

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 Placer County Elections regarding your failure to timely file a semi-annual campaign statement.

The Enforcement Division has completed its review of this case. Our investigation found that you violated the Act because you failed to timely file certain campaign statements and reports, made a prohibited cash expenditure, failed to open a campaign bank account, used campaign funds for personal use, and failed to maintain adequate records.

The Act requires candidate-controlled committees to file semi-annual campaign statements each year no later than July 31 for the period ending June 30 and January 31 for the period ending December 31.² Within 90 days of an election, if a late contribution received totals in the aggregate one thousand dollars or more, it shall be reported within 24 hours of the time it is received.³ No contribution or expenditure of one hundred dollars or more shall be received or made in cash.⁴

The Act also requires that a candidate who raises contributions of two thousand dollars or more in a calendar year shall establish one campaign bank account at a financial institution located in the state.⁵ All contributions or loans made to the candidate, all expenditures, and any personal funds that will promote the candidate's election shall originate from the campaign bank

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, and all regulatory references are to this source.

² Section 84200.

³ Sections 82036 and 84203.

⁴ Section 84300, subd. (a) and (b).

⁵ Section 85201, subd. (a).

account.⁶ No contribution shall be commingled with the personal funds of the recipient or any other person.⁷ All contributions deposited into the campaign account shall be deemed to be held in trust for expenses associated with the candidate's election or for expenses associated with holding office.⁸ Finally, it shall be the duty of each candidate, treasurer, principal officer, and elected officer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign statements were properly filed.⁹

Your actions violated the Act by failing to timely file two semi-annual campaign statements and two 24-hour contribution reports for contributions you received from the Rocklin Teachers Professional Association. You also made a cash withdrawal of \$100 or more. Additionally, you failed to establish a campaign bank account; therefore, campaign contributions received were commingled with your personal funds. It was determined that approximately \$1,682.58 of campaign funds were used for personal use. Further, you failed to maintain adequate records, bills, and receipts necessary to prepare campaign statements. However, mitigating circumstances exist here. You were a first-time candidate and inexperienced with the Act, you were an unsuccessful candidate, your committee raised and spent under \$10,000, the late-filed 24-hour contribution reports were filed before the relevant election, you timely filed the second preelection campaign statement and the post-election semi-annual campaign statement, the personal use of campaign funds was a low amount and occurred after the election, the Committee has since terminated, and you have no history of violating the Act. Based on the foregoing, and in accordance 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 with this warning letter.¹⁰ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.¹¹ Additionally, discretion was used for violations that caused minimal public harm when the total penalty met or exceeded the total amount raised or spent by the filer, lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact, and the committee raised and spent less than \$10,000.¹² This resolution may not be used as a comparable case for other enforcement matters.¹³

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

⁶ Section 85201, subd. (a)-(e).

⁷ Section 84307.

⁸ Section 89510, subd (b).

⁹ Section 84104.

¹⁰ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

¹¹ Regulations 18360.1 and 18360.3.

¹² Regulation 18360.2.

¹³ See Regulation 18361.5, subdivision (e)(3).

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.

Please feel free to contact Angela Brereton at 916-322-5771 or abrereton@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton
Assistant Chief
Enforcement Division