



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

December 21, 2022

Sent via Email: jsutton@campaignlawyers.com

James Sutton

The Sutton Law Firm

O/B/O Monterey County Business Political Action Committee and John Narigi

RE: Closure Letter: FPPC Case No. 2019/00563; In the Matter of Monterey County Business Political Action Committee and John Narigi

Dear James Sutton:

The Enforcement Division of the California Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to our investigation concerning a sworn complaint in connection with the above referenced matter alleging your client violated the earmarking prohibition under the Act. More specifically, the complaint identified language on the Monterey County Business Political Action Committee’s (“Committee”) website which stated that “funds donated to the Committee are reported as contributions to the Committee and reported by candidates as from the Committee.” The website further stated, “This may be a preferable way to make political contributions in contested elections when it may be undesirable to have an individual name or company associated with a donation to a candidate’s campaign.”

After a full investigation, the Enforcement Division found insufficient evidence to support a finding of earmarking. As such, we are closing this matter without further action.

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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 18109 through 18997 of Title 2 of the California Code of Regulations.

Should you have any questions regarding this letter, please feel free to contact me at (916) 324-8787 or bcastillo@fppc.ca.gov.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division

cc: Monterey Bay Action Committee – Candidates (jsutton@campaignlawyers.com)
Monterey County Hospitality Association (info@mcha.net)
Salinas Valley Leadership Group (admin@salinsvalleyleadershipgroup.com)
Ricky Cabrera SVMH System 2018 D1 (juliah@hw-cpa.com)
John Phillips for Monterey County Supervisor D2 2018 [REDACTED]
Lopez for Supervisor 2018 [REDACTED]
Sworn complainant Christian Scheider (christian@pivotalcampaignservices.com)