



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

March 9, 2023

Andrew Werbrock
Olson Remcho, LLP
Via Email: awerbrock@olsonremcho.com

No Action Closure Letter Re: FPPC No. 2019-01516; janz4mayor.com

Dear Andrew Werbrock:

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 the sworn complaint you submitted alleging an unidentified person(s) created a website prior to the March 3, 2020 Primary Election and failed to include the necessary disclosures. After conducting our investigation and review of the case, we are closing this matter without further action as the allegation has been disproven.

The Act defines “committee” to include any person or combination of persons who directly or indirectly receives contributions totaling \$2,000 or more in a calendar year, or makes independent expenditures totaling \$1,000 or more in a calendar year.² Section 84502 of the Act requires committees to include a disclosure on any advertisement paid for by the committee.

The Enforcement Division’s investigation confirmed that the person(s) responsible for the website did not qualify as a committee under the Act and so were not required to include the necessary disclosures on their advertisements.

Should you have any questions regarding this letter, please feel free to contact me at (916) 323-6302 (voicemail) or JRinehart@fppc.ca.gov.

Sincerely,

Jenna Rinehart

Jenna C. Rinehart,
Commission Counsel
Enforcement Division

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.

² Section 82013, subd. (a)-(b).