



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

March 29, 2023

Patanisha Davis Pierson for Brentwood City Council 2022 District 2
Patanisha Davis Pierson
[REDACTED]

Warning Letter Re: FPPC No. 2023-00218; Patanisha Davis Pierson for Brentwood City Council 2022 District 2; Pierson

Dear Ms. Pierson and Committee,

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 anonymous complaint filed against you alleging that you failed to include the occupation and employer information for several contributors disclosed on your first pre-election campaign statement covering the period of January 1, 2022 through September 24, 2022.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to include the required occupation and employer information for contributions received from individual contributors on your first pre-election campaign statement covering the period January 1, 2022 through September 24, 2022.

The Act requires candidate-controlled committees to file two pre-election campaign statements at specified times prior to the election in which the candidate will be on the ballot, as well as semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.² The obligation to file semi-annual campaign statements continues until the candidate or treasurer terminates the committee.

Additionally, the Act requires committees to disclose all contributions received and expenditures made during the period covered by the campaign statement.³ Specifically, a committee must itemize all contributions received totaling \$100 or more received during the period. The committee must report

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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Sections 84200.5 and 84200.

³ Section 84211(a).

specific information, including the amount of the contribution and the full name and street address of the contributor. For individual contributors, the committee must also report the contributor's occupation and employer, or if self-employed, the name of the individual's business.⁴

Your actions violated the Act because you failed to list the occupation and employer information for several individual contributors on the first pre-election campaign statement filed on September 29, 2022. However, for the following reasons, the Enforcement Division has decided to close this matter with this warning letter rather than a fine: you filed an amendment to the first pre-election campaign statement to disclose the occupation and employer information for individual contributors on October 7, 2022, well before the November 8, 2022 election and immediately after you were contacted by the Enforcement Division; the first pre-election campaign was timely filed; you explained that you misunderstood the requirement to include both the contributor's address *and* occupation and employer; and, you have no prior Enforcement history.

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 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.

If you have any questions regarding this letter, please feel free to contact Tara Stock at 916-322-8241 or tstock@fppc.ca.gov.

Sincerely,

Christopher B. Burton

Christopher B. Burton, Acting Chief
Enforcement Division

CBB:ts

⁴ Section 84211(h).