



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

May 17, 2023

Lipstick Bail Bonds
Teresa Golt
720 S Euclid St
Anaheim, CA 92802
[REDACTED]

Warning Letter Re: FPPC No. 2018-00666; Lipstick Bail Bonds; Teresa Golt

Dear Lipstick Bail Bonds and Teresa Golt:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to an anonymous complaint and a sworn complaint which alleged that you failed to timely file campaign statements, 24-hour reports, and a statement of organization; you failed to include the proper disclosures on a variety of advertisements opposing State Senator Bob Hertzberg; and you coordinated the expenditures with Hertzberg’s opponent in the June 2018 Primary Election such that these expenditures should have been reported as contributions.

The Enforcement Division has completed its investigation of the facts in this case. Specifically, the Enforcement Division found that Theresa Golt failed to timely file a Form 496 to report an independent expenditure made on May 22, 2018 within 24 hours, failed to timely file a Form 462 within 10 days from the date of Teresa Golt’s first independent expenditure with respect to the June 5, 2018 Primary Election, and failed to timely file a Form 461 campaign statement by the July 31, 2018 deadline.

The Act requires a committee that makes an independent expenditure aggregating \$1,000 or more during the 90-day period preceding the applicable election, or on the date of the election, to file a Form 496 within 24 hours of making the independent expenditure.²

The Form 462 is required to be filed within 10 days from the date of an independent expenditure that totals, in the aggregate, \$1,000 or more in a calendar year to support or oppose a candidate or measure. A candidate or measure is listed only once for each election. Additionally, the Act requires that the Form 462 is required to be filed with the Commission. The verification

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 82036.5 and 84204.

states that the independent expenditure(s) was not coordinated with the affected candidate or measure committee or their opponent and the committee reported all contributions and reimbursements.³

The Act requires independent expenditure committees to file 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 31.⁴

Teresa Golt violated the Act by failing to timely file a Form 496 to report an independent expenditure made on May 22, 2018 within 24 hours, failed to timely file a Form 462 within 10 days from the date of Teresa Golt's first independent expenditure with respect to the June 5, 2018 Primary Election, and failed to timely file a Form 461 campaign statement by the July 31, 2018 deadline.

The Enforcement Division has determined that mitigating circumstances exist here. The evidence obtained shows that proper disclosures were on Teresa Golt's advertisements when Teresa Golt qualified as an independent expenditure committee; the amount not disclosed in the campaign statements and reports was very low (under \$2,000); the candidate that Teresa Golt opposed won the election; all campaign statements and reports have been filed; and you have no prior 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.⁵ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁶ Additionally, discretion was used for violations that caused minimal public harm when lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected after contact, and the committee spent less than \$10,000.⁷ This resolution may not be used as a comparable case for other enforcement matters.⁸

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.

³ Section 84213.

⁴ Section 84200(b).

⁵ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁶ Regulations 18360.1 and 18360.3.

⁷ Regulation 18360.2.

⁸ See Regulation 18361.5, subdivision (e)(3).

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 yourselves of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten 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 days from the date of this letter.

The Enforcement Division's investigation obtained insufficient evidence that Lipstick Bail Bonds qualified as a committee, that further advertisement disclosures were required, or that coordination occurred between you and Hertzberg's opponent. Thus, there is insufficient evidence to support a finding that you violated the Act regarding these allegations, and the Enforcement Division will not pursue these allegations further.

If you need forms or a manual, or guidance regarding your obligations, please visit our website at www.fppc.ca.gov. Please feel free to contact me at abreron@fppc.ca.gov or (916) 322-5771 (voicemail) with any questions you may have regarding this letter.

Sincerely,

Angela J Brereton

Angela J. Brereton,
Assistant Chief, Enforcement Division