



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

July 13, 2023

Melissa Bradley
[REDACTED]

Warning Letter Re: FPPC No. 2019-00513: Caring Supporters of Melissa Bradley for Marin Healthcare District Board 2018, Melissa Bradley

Dear Melissa Bradley:

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 a referral from the County of Marin Election Department regarding the Caring Supporters of Melissa Bradley for Marin Healthcare District Board 2018’s failure to timely file campaign statements.

The Act requires committees to file semi-annual campaign statements.² Additionally, the Act requires committees to file pre-election campaign statements prior to the election.³ The Act requires committees to file a 24-hour contribution report after receiving a late contribution.⁴ The Act requires a committee to file an amendment to the statement of organization within ten days of a change in any of the information contained in the statement of organization, including the named treasurer or principal officer of the committee.⁵ Finally, the Act requires that prior to solicitation or receipt of any contribution or loan, an individual who intends to be a candidate for an elective state office, shall file with the Secretary of State a candidate statement of intention.⁶

The Act requires each candidate and treasurer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign statements were properly filed.⁷

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 Section 84200.

³ Section 84200.5.

⁴ Section 84203.

⁵ Section 84103.

⁶ Section 85200.

⁷ Section 84104.

The Enforcement Division found that you failed to timely file semi-annual and pre-election campaign statements for the reporting periods ending on October 20, 2018 and December 31, 2018, failing to timely file 24-hour reports for the reporting periods of September 9, 2018 and October 20, 2018, failing to timely file a statement of organization, qualification amendment; failing to timely file a candidate statement of intention, and failing to maintain the proper records for the reporting periods ending September 22, 2018, October 20, 2018, and December 31, 2018.

However, there are certain mitigating factors present: you were inexperienced, you were the primary contributor to your committee, you had no prior enforcement history, and you were unsuccessful in the election. 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.⁸ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁹ This resolution may not be used as a comparable case for other enforcement matters.¹⁰ Although we are issuing the warning letter, you may still be subject to penalties from the filing officer and are still required to file the outstanding reports.

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. Furthermore, the Enforcement Division expects Standafer to file the appropriate campaign statements as they still require filing.

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.

⁸ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁹ Regulations 18360.1 and 18360.3.

¹⁰ See Regulation 18361.5, subdivision (e)(3).

Please feel free to contact Alex Rose at arose@fppc.ca.gov or 916- 327-6358 with any questions you may have regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Alex J. Rose". The signature is written in a cursive, flowing style.

Alex J. Rose, Commission Counsel
Enforcement Division