



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

December 15, 2023

College of the Canyons Faculty Association
Wendy Wynkoop, Anne Marengo, and Laura Stephen
26455 Rockwell Canyon Road
Santa Clarita, CA 91350
Via email: info@cocfaculty.org, [REDACTED]
[REDACTED]

Warning Letter Re: FPPC No. 2023-00332, College of the Canyons Faculty Association Political Action Committee, Wendy Wynkoop, Anne Marengo, and Laura Stephen

Dear Respondents:

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 a sworn complaint alleging that the College of the Canyons Faculty Association Political Action Committee (the “Committee”) committed numerous violations of the Act. The Enforcement Division has completed its review of the matter and determined that the Committee failed to timely report the date for certain contributions received.

When a committee receives contributions (including loans) totaling \$100 or more from a person, the Act requires committees to report on the appropriate campaign statement the contributor’s full name; street address; occupation; the name of their employer, or if self-employed, the name of the business; the date and amount received; and the cumulative amount of contributions.²

The Committee violated the Act by failing to timely report the date and amount received of 28 contributors across the reporting period occurring between July 1, 2018 to September 22, 2018³, 29 contributors across the reporting period occurring between September 23, 2018 to October 20, 2018⁴, 28 contributors across the reporting period occurring between October 21, 2018 and December 31, 2018, 17 contributors across the reporting period occurring between January 1, 2019 to June 30, 2019, 69 contributors across the reporting period occurring between July 31, 2019 to December 31, 2019, 48 contributors across the reporting period occurring

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 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 84211, subd. (f).

³ An administrative action for a violation of the Act has a five-year statute of limitations. In this matter, a tolling agreement was signed by the Respondents on October 11, 2023, effectively tolling the statute of limitations.

⁴ An administrative action for a violation of the Act has a five-year statute of limitations. In this matter, a tolling agreement was signed by the Respondents on October 11, 2023, effectively tolling the statute of limitations.

between January 31, 2020 to June 30, 2020, 49 contributors across the reporting period occurring between July 1, 2020 to September 19, 2020, 52 contributors across the reporting period occurring between September 20, 2020 to October 17, 2020, 55 contributors across the reporting period occurring between October 18, 2020 to December 31, 2020, 40 contributors across the reporting period occurring between January 1, 2021 to June 30, 2021, 52 contributors across the reporting period occurring between July 1, 2021 to December 31, 2021, 41 contributors across the reporting period occurring between January 1, 2022 to June 30, 2022, 40 contributors across the reporting period occurring between July 1, 2022 to October 22, 2022, and 46 contributors across the reporting period occurring between October 23, 2022 to December 31, 2022.

However, there are several mitigating factors present in this case. After receiving contact from the Enforcement Division, the Committee hired a professional treasurer and filed sixteen amendments to disclose the missing date and amount received information for the various reporting periods. The Respondents do not have a prior enforcement history. The violations resulted in minimal public harm as the Committee timely filed campaign statements and timely disclosed the contributions received.

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 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.

If you need forms or a manual, or guidance regarding their obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov. Please feel free to contact me at jrivera@fppc.ca.gov or (916) 738-6411 (voicemail) with any questions you may have regarding this letter.

Sincerely,

Jonathan Rivera

Jonathan Rivera, Commission Counsel
Enforcement Division

cc: Stephen Petzold [REDACTED]