



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

November 9, 2023

Re-Elect Laura Abernathy Mancha for S.B. County School Board

Laura Abernathy Mancha



Warning Letter Re: FPPC No. 2020-00914, Re-Elect Laura Abernathy Mancha for S.B. County School Board and Laura Abernathy Mancha

Dear Re-Elect Laura Abernathy Mancha for S.B. County School Board and Laura Abernathy Mancha:

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 sworn complaint alleging that Re-Elect Laura Abernathy Mancha for S.B. County School Board 2020 (“the Committee”) failed to timely file 24-hour contribution reports. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that the Committee failed to timely file 24-hour contribution reports to disclose nine contributions received.

A central purpose of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring candidates and committees to disclose all contributions received and expenditures made throughout a campaign on timely filed campaign statements and reports.² Each candidate or committee that makes or receives a “late contribution” must file a 24-hour contribution report (“Form 497”) within 24 hours of making or receiving the contribution.³ In the case of a candidate who is on the ballot, a “late contribution” includes any contribution of \$1,000 or more that is received by the candidate or committee during the 90 days leading up to the election. During this time, a “late contribution” also includes multiple smaller contributions from the same source that add up to \$1,000 or more.⁴

You violated the Act because you failed to timely file 24-hour contribution reports to disclose a loan from the candidate and eight different contributions at or over the \$1,000 threshold. However, the Enforcement Division has decided to close this case with a warning letter because you filed the 24-hour contribution reports with the San Bernardino County Registrar before the election, the Committee disclosed all of the late contributions received on timely filed campaign

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 81002, subd. (a); Section 84200, *et seq.*

³ Section 84203.

⁴ Section 82036.

statements, except for the loan, all other late contributions were disclosed by the contributors on timely filed pre-election campaign statements, the Committee has been terminated, there was a low level of experience with 24-hour reports, and the Committee has 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.

Please feel free to contact me at 279-237-3766 or cfelkins@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Michael C. Felkins

Michael C. Felkins, Commission Counsel
Enforcement Division

cc: Wendy Gish, gishgirl67@gmail.com