



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

January 18, 2024

Orrin Heatlie
o/b/o California Political Rebuild Team
[REDACTED]

Warning Letter Re: FPPC No. 2020-00665; California Political Rebuild Team, Orrin Heatlie

Dear Orrin Heatlie:

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 against the California Patriot Coalition (the “Committee”), currently known as the California Political Rebuild Team, regarding improper ad disclosures on a banner advertisement displayed prior to the September 16, 2021 Election.

The Act requires the disclosures for banner advertisements to be in an easily readable format, centered horizontally, the text must be underlined, the font must be at least five percent of the height of the ad, and the disclosures must be in a printed or drawn box with a white background.² Furthermore, the Act requires ballot measure committees to file quarterly campaign statements in addition to the semiannual campaign statements.³

The Enforcement Division found that you paid for a banner advertisement that did not contain disclosures in the proper format. Additionally, you failed to timely file quarterly campaign statements for the due dates of April 30, 2020; October 31, 2020; and April 30, 2021. But, for the following reasons, the Enforcement Division has decided to close this case with this warning letter rather than a fine: the disclosures were proper aside for the format issues, the supported ballot measure was unsuccessful, the banner was corrected eight months prior to the election, you have no enforcement history, and you timely filed semi-annual campaign statements for the same reporting periods as the quarterly reports.

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 84504.2.

³ Section 84202.3.

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 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