



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

March 8, 2024

Micheal Thompson, individually and on behalf of Mike Thompson for Solano County Superior Court Judge 2024

Sent via email: michealthompsonlawoffice@gmail.com

Warning Letter Re: FPPC No. 2024-00273; Micheal Thompson and Mike Thompson for Solano County Superior Court Judge 2024

Dear Michael Thompson:

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 you, as a candidate for Solano County Superior Court Judge on the March 5, 2024 Primary Election ballot, produced advertisements that did not include a disclosure and failed to timely file a statement of organization to establish a committee.

The Enforcement Division has completed its review of the facts in this case. Specifically, we determined that the advertisements identified in the complaint did not require a disclosure. Additionally, we found that you failed to timely file a statement of organization by the February 29, 2024 due date to establish your committee, Mike Thompson for Solano County Superior Court Judge 2024 (the “Committee”), and to disclose the Committee’s February 19, 2024 date of qualification.

The Act requires candidate-controlled committees to file a statement of organization within 10 days after the committee has qualified as a committee.² The original statement of organization must be filed with the Secretary of State and a copy must be filed with the local filing officer.³ Controlling candidates are jointly and severally liable for violations by the committee.⁴

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 84101, subd. (a).

³ *Id.*

⁴ Sections 83116.5 and 91006.

Your actions violated the Act because you failed to timely file the statement of organization with the Secretary of State and the County of Solano, as discussed above. However, for the following reasons, the Enforcement Division has decided to close this case with this warning letter: you filed the statement of organization with the Secretary of State and the County of Solano immediately after you were contacted by the Enforcement Division and prior to the election; you also filed a Form 460 to disclose your activities prior to the election; you used your personal funds for your entire campaign and the activity was relatively low; and you have no history of violating the Act. Please note that while the Enforcement Division is closing this matter without a fine, your filing officer may assess late filing penalties.

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 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 10 days from the date of this letter.

If you have any questions regarding this letter, please contact me at (279) 237-5910 or JRinehart@fppc.ca.gov.

Sincerely,

Jenna Rinehart

Jenna C. Rinehart
Senior Commission Counsel
Enforcement Division

cc: Bryan Kim [REDACTED]