



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

December 15, 2023

Brentwood Alliance Against Measure L; committee with major funding from the Northern California Carpenters Regional Council  
[REDACTED]

Kathleen Griffin  
[REDACTED]

**Warning Letter Re: FPPC No. 2019-01492, In the Matter of Brentwood Alliance Against Measure L; committee with major funding from the Northern California Carpenters Regional Council; Kathleen Griffin**

Dear All:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This case arose from a sworn complaint alleging various violations of the Act. An investigation determined that the Committee, Brentwood Alliance Against Measure L; committee with major funding from the Northern California Carpenters Regional Council (“the Committee”) and Kathleen Griffin (as principal officer and treasurer) failed to comply with the Act’s committee naming requirements, campaign filing requirements, and advertisement disclosure requirements.

The Act requires committees that become sponsored<sup>2</sup> to include the language “sponsored by” in the committee name.<sup>3</sup> This name change requires the filing of an amended 410 within 10 days to reflect the committee’s new name.<sup>4</sup> The Committee became sponsored on or around September 3, 2019 when it received a \$20,000 contribution from Northern California Carpenters Regional Council Issues PAC (“NCCRC”), which constituted 84% of its total contributions. The Committee was then required to file an amended 410 to include “sponsored by [the sponsor’s name]” by September 13, 2019. On October 16, 2019, the Committee filed an amended 410 to change the Committee’s name to “Brentwood Alliance Against Measure L; committee with major funding from the Northern California Carpenters Regional Council,” however the name

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<sup>1</sup> 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.

<sup>2</sup> Section 82048.7; Regulation 18419.

<sup>3</sup> Section 84106; Regulation 18419.

<sup>4</sup> Section 84103.

change was already 33 days overdue. Additionally, the precise language required to indicate a sponsored committee was not used and the Committee's name remained incorrect for an additional 3 days while the Committee remained sponsored. Therefore, the Committee violated the Act by failing to properly update the Committee name with the precise language required for sponsored committees and by failing to timely file an amended 410 by September 13, 2019 reflecting the updated committee name.

The Act also requires primarily formed ballot measure committees to file semiannual campaign statements until it terminates; the semiannual statement covering the period January 1 – June 30 is due by July 31 and the statement covering the period July 1 – December 31 is due by January 31 of the following year.<sup>5</sup> The Committee violated the Act by failing to file seven semiannual campaign statements, which were due on July 31, 2020, February 1, 2021, August 2, 2021, January 31, 2022, August 1, 2022, January 31, 2023, and July 31, 2023.

Further, the Act requires campaign advertisements to include various disclosures. Print ads that are designed to be individually distributed should include a disclaimer with the language “Ad paid for by [committee’s name]” centered horizontally, underlined (except for the “Ad paid for by”), in contrasting color, in at least 10-point font placed in a printed or drawn box with solid white background at the bottom of at least one page and set apart from the other printed text.<sup>6</sup> Ads that are larger than those designed to be individually distributed should include “Ad paid for by [committee’s name]” with the font a height of at least 5% of the advertisement, underlined (except for the “Ad paid for by”), on a solid background with reasonably legible contrast.<sup>7</sup> Social media ads should include “Ad paid for by” in at least 8-point font and contrasting color on the committee’s profile, landing page, or similar location.<sup>8</sup> Website ads should include “Paid for by” printed legibly in at least 8-point font and contrasting color at the top or bottom of every publicly accessible page of the website.<sup>9</sup> Additional disclosure requirements exist if the committee has top donors. The Committee’s failure to comply with the Act’s committee naming requirements caused multiple advertisement disclosure statements to be incomplete or incorrect. The Committee violated the Act by failing to include the correct Committee name, the word “ad,” and/or the correct display requirements for multiple print ads and large print ads. The Committee also violated the Act by failing to include any disclosure statement on its social media page and various website pages.

For the following reasons, the Enforcement Division has decided to close this case with a warning letter rather than a fine: the Committee filed an amended 410 to update the committee name after being contacted by the Enforcement Division and it was filed before the election, the

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<sup>5</sup> Section 84200.

<sup>6</sup> Section 84504.2.

<sup>7</sup> Section 84504.2.

<sup>8</sup> Section 84504.3.

<sup>9</sup> Section 84504.3.

Committee made a good faith effort to comply with the Act's committee naming and advertisement disclosure requirements, there was no evidence of an intent to violate the Act or conceal the violations, the Committee cooperated with the Enforcement Division promptly in an attempt to correct the advertisement disclosure violations, the advertisements were in opposition to Measure L and were not misleading, the committee name included the sponsor's name although it did not include the precise language required, and the Committee has no prior enforcement history. 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.<sup>10</sup> Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.<sup>11</sup> This resolution may not be used as a comparable case for other enforcement matters.<sup>12</sup> 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 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.

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<sup>10</sup> <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

<sup>11</sup> Regulation 18360.1.

<sup>12</sup> Regulation 18361.5(e)(3).

Please feel free to contact me by e-mail at [vjimmy@fppc.ca.gov](mailto:vjimmy@fppc.ca.gov) or at (279) 237-5971 with any questions you may have regarding this letter.

Sincerely,

*Vanessa Jimmy*

Vanessa Jimmy, Commission Counsel  
Enforcement Division

cc: Sworn Complainant, George Cardinale

