



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

March 20, 2024

Green Party of Los Angeles County
Douglas Barnett
PO Box 82222
Los Angeles, CA 90082
[REDACTED]

Warning Letter Re: FPPC No. 2022-00050, Green Party of Los Angeles County and Douglas Barnett

Dear Respondents:

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 referral from Los Angeles County alleging that the committee, Green Party of Los Angeles County (the “Committee”), failed to timely file certain semi-annual campaign statements. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that the Committee failed to timely file several semi-annual statements.

The Act requires general purpose committees to file semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.² The obligation to file semi-annual campaign statements continues until the controlling officer or treasurer terminates the committee. Controlling officers and committee treasurers are jointly and severally liable for violations by the committee.³

Your actions violated the Act because the Committee failed to timely file the semi-annual campaign statement for the periods ending June 30, 2019, December 31, 2019, June 30, 2020, December 31, 2020, June 30, 2021, December 31, 2021, June 30, 2022, December 31, 2022, June 30, 2023, and December 31, 2023 by the applicable deadlines.⁴ However, there are certain mitigating factors present in this case: the violations at issue here caused minimal public harm, most of the statements were filed a few days after the applicable due dates, you and the

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 Sections 84200.5 and 84200.

³ Sections 83116.5 and 91006.

⁴ Additionally, you failed to timely file the semi-annual campaign statement for the period ending December 31, 2018. However, this violation is past the applicable statute of limitations.

Committee have no prior history of violating the Act, and there was very little activity to report. 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.⁵ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁶ This resolution may not be used as a comparable case for other enforcement matters.⁷

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 279-237-5913 or jrivera@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Jonathan Rivera

Jonathan Rivera, Commission Counsel
Enforcement Division

cc: Charlene Cruz CCruz@rrcc.lacounty.gov

⁵ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁶ Regulations 18360.1 and 18360.3.

⁷ See Regulation 18361.5, subdivision (e)(3).