



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

October 19, 2023

Alex Zamansky for San Juan Unified School Board for 2022 Election
Alex Zamansky, Candidate
David Long, Treasurer
[REDACTED]

Warning Letter Re: FPPC Case No. 2023-00098; Alex Zamansky for San Juan Unified School Board for 2022 Election

Dear Mr. Zamansky, Mr. Long, & Alex Zamansky for San Juan Unified School Board for 2022 Election,

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 complaint filed against your committee: Alex Zamansky for San Juan Unified School Board for 2022 Election (“the Committee”), that alleged you violated the Act’s campaign reporting provisions. The Enforcement Division has completed its review of this matter and found that you and the Committee failed to properly report information regarding contributors and expenditures on the first and second pre-election campaign statements filed in advance of the November 8, 2022 election.

The Act requires committees to disclose precise information on their campaign statements. Specifically, the Act requires that committees disclose the full name, street address, occupation, and employer for every individual who contribution \$100 or more to the campaign during the statement period.² Further, the Act requires the committee disclose the full name, street address, and description for every expenditure made by the committee of \$100 or more.³

You and the Committee violated the Act because you failed to report address, occupation, and employer information for \$3,705 of contributions – and name and address information for \$2,888 of expenditures – on the first pre-election campaign statement for the period July 1, 2022 through September 24, 2022; and failed to report the same for a \$100 contribution on the second

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 84211

³ *Ibid.*

pre-election campaign statement for the period September 25, 2022 through October 22, 2022. However, mitigating evidence exists such that the Enforcement Division has elected to resolve this case with a warning letter rather than a fine: you incorrectly reported the contributors as “intermediaries” so some information, including the name of contributor(s), was properly disclosed on the original filings; you reported the expenditure activity incorrectly showing yourself as payee, but did include a description of the nature of the payment; you have since filed amendments to the first and second pre-election reports to properly disclose the required information commensurate with §84211; you were a first time, unsuccessful candidate; and finally, you and the Committee do not have a prior history of violation the Act.

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 your client with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If your clients wish to avail themselves of these proceedings by requesting that this 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.

If your clients need forms or a manual, or guidance regarding their obligations, please call the Commission’s Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact Ginny Brown at gbrown@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Christopher B. Burton

Christopher B. Burton, Assistant Chief
Enforcement Division
CBB:gab