



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

December 6, 2024

Aaron Park, individually and on behalf of Placer County Good Government PAC

Via email: [REDACTED]

Thomas Montgomery, individually and on behalf of Placer County Good Government PAC

Via email: [REDACTED]

Warning Letter Re: FPPC No. 2021-00361; Placer County Good Government PAC, Aaron Park, and Thomas Montgomery

Dear Aaron Park and Thomas Montgomery:

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 Placer County Good Government PAC (the “Committee”) violated the Act by failing to include a disclosure on the Committee’s website and Facebook page.

The Enforcement Division has completed its investigation and review of the facts in this case. Specifically, we found that while the Committee’s website did include a disclosure it failed to include the precise “not authorized” disclosure language. Additionally, we found that while each of the Committee’s Facebook advertisements included a disclosure, each failed to include the “not authorized” disclosure language. However, each Facebook advertisement included a link to the Committee’s website that contained the disclosures as discussed above. Furthermore, the Enforcement Division found that the Committee failed to timely file an amendment to its statement of organization to disclose its date of qualification, by the August 24, 2020 due date.

The Act requires a committee to file an amendment to its statement of organization within 10 days if there is a change in any of the information contained in the statement of organization.² An advertisement supporting or opposing a candidate that is paid for by an independent expenditure shall include a statement that it was not authorized by a candidate or a

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.

² Section 84103, subd. (a).

committee controlled by a candidate.³ An electronic media advertisement may include a link to an internet website paid for by the committee that contains the required disclosures.⁴

The Committee and Aaron Park violated the Act because they failed to include the precise “not authorized” disclosure language on the Committee’s website. The Committee and Thomas Montgomery violated the Act because they failed to timely file an amendment to the statement of organization to disclose the Committee’s date of qualification. Since it was clear who produced and paid for the advertisements at issue here, the Committee has terminated, the violations resulted in minimal public harm, and neither the Committee nor the principal officer have a prior enforcement history, the Enforcement Division has decided to close the matter with this warning letter.

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 Regulations 18360.1 and 18360.2 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 need forms or a manual, or guidance regarding your 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 me at JRinehart@fppc.ca.gov or (279) 237-5910 with any questions you may have regarding this letter.

Sincerely,

Jenna Rinehart

Jenna C. Rinehart,
Senior Commission Counsel
Enforcement Division

cc: Victor Bekhet ybekhet@yahoo.com

³ Section 84506.5.

⁴ Section 84504.3, subd. (b).