



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

December 12, 2024

Committee Supporting Mayor Craig and Councilmembers McShane & Cromeenes 2022,
sponsored by Salinas Police Officers Association

Principal Officer: David Pritt
1 W. Manchester Blvd., Suite 700
Inglewood CA, 90301

Via email: cine@politicalreportingplus.com

Warning Letter re: FPPC Case No. 2023-00630; Committee Supporting Mayor Craig and Councilmember McShane & Cromeenes 2022, sponsored by Salinas Police Officers Association and David Pritt

Dear Respondents:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ As you are aware, the Enforcement Division opened a commission-initiated case related to the committee “Committee Supporting Mayor Craig and Councilmember McShane & Cromeenes 2022, sponsored by Salinas Police Officers Association’s (the “Committee”) website. The Enforcement Division has completed its review of the matter and found that you failed to include some of the required disclaimers on the Committee website in advance of the November 8, 2022 General Election.

Under the Act, any advertisement that is paid for by a committee, other than a political party committee or candidate-controlled committee established for an elective office of the controlling candidate, shall include the words “Ad paid for by” followed by the name of the committee.² The Act also requires advertisements paid for by a committee, other than a political party committee or candidate-controlled committee established for an elective office of the controlling candidate, to include the words “committee major funding from” followed by the names of the top contributors to the committee paying for the advertisement.³ Further, an advertisement supporting or opposing a candidate that is paid for by an independent expenditure must include a statement that the advertisement was not authorized by a candidate or a committee controlled by a candidate.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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 84502, subd. (a)(1). Per Section 84502, subd. (c), an advertisement that is a printed letter may use the words “Paid for by” instead of “Ad paid for by.”

³ Section 84503. “Top contributors” means the persons from whom the committee paying for an advertisement has received its three highest cumulative contributions of \$50,000 or more. Section 84501, subd. (c).

⁴ Section 84506.5.

You violated the Act because the Committee website failed to meet the advertising disclaimer requirements of the Act. Although the Committee website included the required “Paid for by” and “not authorized” disclaimers, the Committee failed to include the required “top contributor” disclaimer for the Committees’ top contributor, Salinas Police Officers Association. However, there are certain mitigating factors present in this case: the Committee has terminated, the single top contributor was reported prior to the election on the Committee’s timely-filed campaign statement and appeared in the name of the Committee, and you have no prior history of violating the Act. 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 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 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 cfelkins@fppc.ca.gov or (279) 237-3766 with any questions you may have regarding this letter.

Sincerely,

Michael Chance Felkins

Michael Chance Felkins
Commission Counsel
Fair Political Practices Commission

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, subd. (e)(3).