



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

November 20, 2024

El Camino College Federation of Teachers Committee on Political Education
Kelsey Iino, Treasurer
Via Email Only: kiino@usc.edu

Warning Letter Re: FPPC Case No. 2020-00916; El Camino College Federation of Teachers Committee on Political Education; Kelsey Iino

Dear Committee and Kelsey Iino:

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 an anonymous complaint alleging that El Camino College Federation of Teachers Committee on Political Education (the “Committee”), violated the advertisement disclosure provisions of the Act concerning YouTube video advertisements prior to the November 3, 2020 election. The Enforcement Division has completed its review of the facts in this case and has found that the Committee failed to include the required advertisement disclosures.

The Act requires that an advertisement paid for by a committee, other than a political party committee or a candidate controlled committee established for an elective office of the controlling candidate, that is disseminated as a video, including advertisements on television and videos disseminated over the Internet, include a disclosure displaying the words “Ad paid for by [committee name]” at the beginning or end of the advertisement, written and displayed for at least 10 seconds for a broadcast that lasts longer than 30 seconds.² The disclosure has additional display requirements listed in Section 84504.1.

The Committee violated the Act because it disseminated a video advertisement via YouTube that failed to include any disclosure. However, the Enforcement Division has determined that mitigating circumstances are present here and has decided to close this case with a warning letter rather than a fine for the following reasons: it was clear that the Committee produced the YouTube video advertisement, the Committee cooperated during the investigation and added a disclosure to the video advertisement once contacted by the Enforcement Division, the missing disclosure resulted in relatively low public harm, there was no evidence of an intent to violate the Act or conceal the violations, and the Committee does not have prior Enforcement history involving the same violation.

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 Section 84504.1.

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.

Please feel free to contact me at vjimmy@fppc.ca.gov or (279) 237-5971 with any questions that you may have regarding this letter.

Sincerely,

Vanessa Jimmy

Vanessa Jimmy
Commission Counsel
Enforcement Division