



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

June 7, 2024

Becky Steinbruner
vote4beckysteinbruner@gmail.com

Warning Letter re: FPPC Case No. 2020-00230; Becky Steinbruner; Becky Steinbruner for Supervisor 2020

Dear Becky Steinbruner:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This case arises from multiple complaints against you in your capacity as a candidate for Santa Cruz County Board of Supervisors in the election held March 3, 2020. The complaints included allegations regarding anonymous contributions, failure to report campaign expenditures for advertisements, and failure to use required “paid for by” language in campaign advertisements.

On or about January 23, 2020, you filed a Form 460 pre-election campaign statement for the reporting period of January 1 through January 18, 2020. Also, on or about February 20, 2020, you filed another Form 460 pre-election statement for the period of January 19 through February 15, 2020. Additionally, on or about June 30, 2020, you filed a semi-annual campaign statement for the period of February 16 through June 30, 2020.

On Schedule E of your semi-annual campaign statement, you reported a payment in the amount of \$395 for advertising in the Aptos Times in support of your candidacy. However, it appears that the advertisement began running at least as early as February 1 of that year. Thus, payment for the ad should have been reported on one or both of your pre-election campaign statements, but it was not—in violation of Section 84211.²

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 Normally, an expenditure of \$100 or more must be reported on Schedule E of the Form 460—but if the ad runs and payment is not made until the next reporting period, then for the period when the ad started to run, the cost of the ad must be reported on Schedule F as an accrued expense/unpaid bill. See Section 82025, which provides: “An expenditure is made on the date the payment is made or on the date consideration, if any, is received, whichever is *earlier*.” Emphasis added.

In mitigation, on or about the date of the election, you filed a Form 460 (for a stated reporting period of 2/16 – 2/27/20), which disclosed payment for advertising in the Aptos Times. (This filing was not required by law, as the next Form 460 was not due until 7/31/20.) Also, you did not win the election, and you do not have a history of prior, similar violations.

Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which require the Enforcement Division to take all appropriate action within its discretion to decrease the Division's annual carryover caseload, the Enforcement Division is closing this case with this warning letter for the violation noted above. As to the remaining complaint allegations, this matter is being closed without further action.³ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁴ This resolution may not be used as a comparable case for other enforcement matters.⁵

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. Generally, failure to comply with the Act in the future may result in monetary penalties as high as \$5,000 per 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.

If you need guidance regarding your obligations in the future, please visit our website at www.fppc.ca.gov/advice.html or call the Commission's Toll-Free Advice Line at 1-866-ASK-FPPC (1-866-275-3772).

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³ Source: <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>.

⁴ Regulations 18360.1 through 18360.3.

⁵ Regulation 18361.5, subdivision (e)(3).

Thank you for your attention to this matter. Do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

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cc: John Wiechman (sworn complainant)