



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

April 18, 2024

Dublin Teacher's Association Political Action Committee, sponsored by Dublin Teacher's Association

Nancy Karell, Treasurer

Via email: [REDACTED]

Warning Letter Re: FPPC No. 2024-00461; Dublin Teacher's Association Political Action Committee, sponsored by Dublin Teacher's Association

Dear Dublin Teacher's Association Political Action Committee and Nancy Karell:

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 received an anonymous complaint alleging that you violated the campaign disclosure provisions of the Political Reform Act. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to properly disclose intermediary contributions on Schedule A of the campaign statements covering the periods of July 1, 2022 through September 24, 2022, October 23, 2022 through December 31, 2022, January 1, 2023 through June 30, 2023, and July 1, 2023 through December 31, 2023.

The Act requires committees to disclose all contributions received and expenditures made during the period covered by the campaign statement. Specifically, Section 84211(d) states that a campaign statement must disclose all contributions of less than \$100 received during the period. Further, Section 84302 states that committees must report the name and address of any person who acts as an intermediary for a contributor.

You violated the Act because you failed to disclose the Dublin Teacher's Association as an intermediary for contributions received into the committee by the Association's members. However, the Enforcement Division has decided to close this case with a warning letter rather than a fine because you timely disclosed all other required information (e.g. the full amount of contributions received during the period), and you filed amendments to the applicable campaign statements immediately after Enforcement contact. Further, it does not appear that your failure to disclose intermediary information was intended to conceal the information or deceive the public.

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.

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 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 Shelby Pearce at spearce@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Christopher B. Burton

Christopher B. Burton, Assistant Chief
Enforcement Division

CBB: sp