



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

October 8, 2024

Sent Via Email: [REDACTED]
Roy George, Individually and
O/B/O Roy George for Supervisor 2020

Sent Via Email: [REDACTED]
Vona Copp, Individually as Treasurer and
O/B/O Roy George for Supervisor 2020

Warning Letter Re: FPPC No. 2021-00796; In the Matter of Roy George for Supervisor 2020, Roy George, and Vona Copp

Dear Roy George, Vona Copp and Roy George for Supervisor 2020:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act.¹ This case was opened in response to an audit performed by the Commission’s Audit Division with respect to the controlled-committee Roy George for Supervisor 2020 (“Committee”), Roy George, and Vona Copp. The period covered by the audit was January 1, 2019 through December 31, 2020.²

The Commission’s Audit Division determined that the Committee substantially complied with the requirements under the Act. However, multiple recordkeeping violations were identified in the immaterial findings of the audit.

The Act imposes important safeguards that are meant to create a paper trail to aid the audit and enforcement process. For example, each candidate, treasurer, and elected officer must maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign statements were properly filed, and to otherwise comply with the Act’s campaign disclosure provisions. This requirement includes a duty to maintain detailed information and original source documentation for all contributions and expenditures. Generally, records must be maintained for a period of four years following the date that the campaign statement to which they relate is filed, or two years after the adoption of an audit, whichever period is shorter. Required records include receipts and invoices in support of expenditures.³

The Enforcement Division has completed its review of the facts of this case. Specifically, we found that the Committee, George and Copp failed to properly maintain original source records for \$7,924

¹The 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 This audit was adopted September 10, 2024.

³ Section 84104 and Regulation 18401.

in loans and contributions received, along with \$4,108 in expenditures made. However, the Enforcement Division has decided to close this case with a warning letter rather than a fine because you provided bank statements and a check registrar, some payments made via credit card were confirmed, there was no evidence of concealment, the campaign was largely self-funded, George withdrew from the election and was not listed on the ballot, the Committee is now terminated, and the Committee has no prior history of violating the Act.

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 have questions regarding this letter, please contact me at bcastillo@fppc.ca.gov or (279) 237-3764.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division