



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

April 8, 2025

Michael Allman
Allman for School Board 2024
Via email only: michael@allmanforschoolboard.com

Warning Letter Re: FPPC Case No. 2024-00971; Michael Allman; Allman for School Board 2024

Dear Michael Allman and Committee:

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 sworn complaints alleging violations of campaign disclosure provisions and advertisement disclaimer provisions of the Act. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you and the Committee failed to timely file an amended Statement of Organization (Form 410) with the Secretary of State (“SOS”) and your local filing officer and failed to timely disclose one expenditure on your first pre-election campaign statement relating to the November 5, 2024, General Election. Additionally, the Committee sent two mass mailings that failed to include the Committee’s address.

The Act requires a candidate controlled committee to file an original of the Statement of Organization with the SOS and a copy with the local filing officer within 10 days after the committee has qualified.² Additionally, the Act requires candidate controlled committees to disclose specific information on their campaign statements including the total amount of expenditures made during the period covered by the campaign statement and the total cumulative amount of expenditures made.³ Finally, the Act requires a candidate who sends a mass mailing (over 200 substantially similar pieces of mail) to include the committee’s street address in no less than 6-point type font on one side of the mailer.⁴

You and the Committee violated the Act because you failed to timely file an Amended Form 410 with the SOS and local filing officer notating the Committee’s qualification date within ten days of qualifying as a committee. Additionally, you failed to timely disclose one expenditure in the amount of \$128.17 on your first pre-election statement.

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 Sections 84101 and 84103.

³ Section 84211(b).

⁴ Section 84305; Regulation 18435.

Finally, you and the Committee failed to include the Committee's address on two mass mailers sent on or around September 14, 2024. But, for the following reasons, the Enforcement Division has decided to close your case with a warning letter rather than a fine: you filed amendments as soon as you were contacted by the Enforcement Division; the undisclosed expenditure was a low percentage of overall expenditure activity for the reporting period (.02%), the failure to include the Committee's address on the mass mailers was found to be an oversight by the printer, you have a low level of experience with the Act, and you have no prior Enforcement history. Please note that while the Enforcement Division is closing this matter without a fine, your filing officer may assess late filing penalties.

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.

Should you have any questions regarding this letter, please feel free to contact me at lcolumbel@fppc.ca.gov or (279) 237-5974.

Sincerely,

Laura Columbel

Laura Columbel
Commission Counsel
Enforcement Division

Cc: Bob Ayers and Kevin Sabellico