



March 19, 2025

Gary Winuk, Esq.
o/b/o Karla Brown
Via email: gwinuk@kaufmanlegalgroup.com

Warning Letter re: FPPC No. 2023-00463; Karla Brown

Dear Karla Brown:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to an anonymous complaint received by the Enforcement Division alleging failure to timely report economic interests on your Statements of Economic Interests (“SEI”). The Enforcement Division found that as a result of your position as a Pleasanton City Council member and as the Mayor of Pleasanton, the Act required you to periodically file SEIs and that you failed to timely report the disposition dates for stocks on your 2019 Annual SEI and 2021 Annual SEI.

Section 87200 of the Act requires certain public officials to disclose reportable interests including their investments, real property, and income received.² Every person enumerated within Section 87200 must file an SEI within 30 days of assuming office, annually thereafter at the time specified by Commission regulations, and within 30 days of leaving office.³

Your actions violated the Act by failing to timely disclose the disposition dates for stocks on your 2019 Annual SEI and 2021 Annual SEI.⁴ However, since you are no longer in this position, you have no prior Enforcement history, you promptly filed amendments to your SEIs, and were responsive when contacted by the Enforcement Division, we are closing your case with this warning letter rather than a fine.

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.

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 Government Code Section 87200.

³ Government Code Section 87202 and 87203.

⁴ Government Code Section 91000.5 provides that the Act’s statute of limitations to pursue administrative prosecution is five years. Your 2018 Annual SEI also failed to timely report the disposition dates for stocks. However, these violations are outside of the Act’s statute of limitations and are therefore not a part of this warning letter.

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 have any questions regarding this letter, please contact Jaleena Evans at jevans@fppc.ca.gov or 279-237-3754.

Sincerely,

Jaleena Evans

Jaleena Evans, Attorney
Enforcement Division