



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

January 23, 2025

Committee to Support the Quality Teachers, Staff & Schools Measure 2020, Yes on I
John Echeto
Via email: [REDACTED]

Warning Letter Re: FPPC No. 21/1095; Committee to Support the Quality Teachers, Staff & Schools Measure 2020, Yes on I

Dear Committee,

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 initiated an investigation into the Committee to Support the Quality Teachers, Staff & Schools Measure 2020, Yes on I (the “Committee”) after various advertisements were alleged to be missing the correct disclosure. The Enforcement Division has completed its investigation and found that the Committee failed to comply with the Act’s committee naming requirements, advertising disclosure requirements, and campaign filing requirements.²

The Act requires primarily-formed committees to file two pre-election campaign statements at specified times prior to the election in which the measure will be on the ballot, as well as semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.³ The obligation to file semi-annual campaign statements continues until the committee is terminated.⁴

The Act requires that committees include the disclaimer “Ad paid for by,” in a contrasting color that is easily readable by the average viewer and in no less than 10-point font on the cover or header photo of the committee’s profile, landing page, or similar location; or on each individual post that is an advertisement. The disclosures must be visible on the cover or header photo when the profile, landing page, or similar location is viewed from any electronic device that is commonly used to view this form of electronic media including, but not limited to, a computer screen, laptop, tablet or smart phone. If this is impracticable only a hyperlink, icon,

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 The committee naming violations were resolved with a stipulation approved by the Commission on January 16, 2025. This letter addresses the advertising disclosure violations and campaign filing violations.

³ Sections 84200.5 and 84200.

⁴ Sections 83116.5 and 91006.

button, or tab to an internet website containing the required “Ad paid for by,” disclosure is permissible.⁵ Additionally, the Act requires committees to include “Ad paid for by [committee’s name (on file with Form 410 or 461)]” at the top of the disclosure area and that the disclosure format be in Arial equivalent font, in at least 10-point size, in a contrasting color, centered horizontally and, except for the names of top contributors, underlined. If there are no top contributors, the “Ad paid for by” need not be underlined. All text must appear in a printed or drawn box with a solid white background at the bottom of at least one page and set apart from other printed matter.⁶

Your actions violated the Act because you failed to have the correct disclosure on a social media page and yard sign. Additionally, your actions violated the Act because you failed to timely file two pre-election campaign statements and four semi-annual campaign statements before the applicable deadlines. However, for the following reasons, the Enforcement Division is closing this case with a warning letter rather than a fine: there was very little activity to report on the semi-annual campaign statements, it was clear that your committee was responsible for the Facebook page as well as the yard sign, the lack of disclosure on the Facebook page and yard sign caused minimal public harm, you and the Committee have no prior history of violating the Act, and you attempted to disclose your campaign activity with a quarterly campaign statement that detailed the activity of the first and second pre-election period.

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 your client 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.

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⁵ Section 84054.4(b).

⁶ Section 84054.2.

Please feel free to contact me at jrivera@fppc.ca.gov or (279) 237-5913 with any questions you may have regarding this letter.

Sincerely,

Jonathan Rivera

Jonathan Rivera, Commission Counsel
Enforcement Division