



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

July 7, 2025

Kelly Liang w/ Olson Remcho, LLP
o/b/o Kern Law Enforcement Association PAC and Tim Caughron, Principal Officer
Via email only: kliang@olsonremcho.com

Warning Letter re: FPPC No. 2023-00104; Kern Law Enforcement Association PAC, Tim Caughron

Dear Kelly Liang:

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 commenced an investigation regarding your client’s potential violation of the Act’s advertisement disclosure provisions after receiving an anonymous complaint. The Enforcement Division has completed its investigation of this case and found that your client failed to comply with campaign advertisement formatting requirements.

The Act requires that an advertisement disseminated as a video display the name of the committee preceded by the words “Ad paid for by” at the beginning or end of the advertisement for at least 10 seconds for a video that lasts longer than 30 seconds.² For independent expenditure ads on candidates, the disclosure must also include a statement that the advertisement was not authorized by a candidate or committee controlled by a candidate.³ The “not authorized by” language must not appear in all capital letters.⁴ Your client’s actions violated the Act by displaying the “not authorized by” language for a video advertisement supporting Brian Smith for Supervisor 2022 in all capital letters. However, the public harm was low because all of the required language was included in the disclosure and was legible, there was no evidence of an intent to violate the Act, and your client does not have prior Enforcement history involving the same violation. Based on the foregoing, the Enforcement Division is closing this case with this warning letter.

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 Section 84504.1.

³ Section 84504.1.

⁴ Section 84505.

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 your client needs guidance regarding their obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

If you have any questions regarding this letter, please contact me at vjimmy@fppc.ca.gov or (279) 237-5971.

Sincerely,

Vanessa Jimmy

Vanessa Jimmy
Commission Counsel
Enforcement Division