



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

June 4, 2025

Gayne Brenneman

Via email: [REDACTED]

Warning Letter Re: FPPC No. 2021-00626; Gayne Brenneman

Dear Gayne Brenneman:

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 a sworn complaint alleging that you failed to properly disclose expenditures in violation of the Act’s campaign filing provisions. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to timely file your Candidate Campaign Statement Form 470 Supplement and a 24-hour late contribution report by the specified deadlines.

The Act permits candidates who do not plan to raise or spend more than \$2,000 during a calendar year to file a Candidate Campaign Statement Short Form (“Form 470”) in place of all required pre-election campaign and semiannual campaign statements for the year.² In order to avoid the obligation to file pre-election campaign statements, a candidate needs to file the Form 470 on or before the first pre-election campaign statement due date. If a candidate files the Form 470 for an election and thereafter receives contributions or makes expenditures totaling \$2,000 or more prior to the election, the candidate shall send written notification to the Secretary of State, the local filing officer, and each candidate for the same office within 48 hours of raising or spending \$2,000 or more.³ The Act also requires candidates that make or receive a late contribution to file a late contribution report within 24 hours of making or receiving the contribution.⁴

You violated the Act because you failed to file your Form 470 Supplement within 48 hours of receiving contributions totaling more than \$2,000. Additionally, you failed to timely file a 24-hour late contribution report. However, we are closing this matter with this warning letter

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 84206; Regulation 18406.

³ Ibid.

⁴ Section 84203.

because you were inexperienced with the requirements of the Act, you were the source of the funds disclosed on the late report, the late contribution was reported timely on the pre-election campaign statement filed by your committee, you were unsuccessful, and the committee is terminated.

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 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.

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

Sincerely,

Jonathan Rivera

Jonathan Rivera,
Commission Counsel
Enforcement Division