



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

May 27, 2025

Sent Via Email: lfreedman@cityofwalnut.org
Linda Freedman, Individually and
O/B/O Linda Freedman for Walnut City Council 2020

Sent Via Email: [REDACTED]
Cheryl Slaton, Individually as Treasurer and
O/B/O Linda Freedman for Walnut City Council 2020

Warning Letter Re: FPPC No. 2022-00935; In the Matter of Linda Freedman for Walnut City Council 2020, Linda Freedman, and Cheryl Slaton

Dear Linda Freedman for Walnut City Council 2020, Linda Freedman, and Cheryl Slaton:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act.¹ This case was opened in response to an audit performed by the Franchise Tax Board (“FTB”) with respect to the controlled-committee Linda Freedman for Walnut City Council 2020 (“Committee”), Linda Freedman, and Cheryl Slaton. The period covered by the audit was January 1, 2020 through December 31, 2020.

The FTB determined that the Committee substantially complied with the requirements under the Act. However, a one bank account violation was identified in the material findings of the audit and multiple disclosure and recordkeeping violations were identified in the immaterial findings of the audit.

The Act requires that all contributions or loans made to the candidate’s controlled committee, as well as any personal funds which will be utilized to promote the election of the candidate, must be deposited in the campaign bank account prior to expenditure.² The Act also requires that all campaign expenditures must be made from the campaign bank account.³ Additionally, each candidate, treasurer, and elected officer must maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign statements were properly filed, and to otherwise comply with the Act’s campaign disclosure provisions. This requirement includes a duty to maintain detailed information and original source documentation for all contributions and expenditures.⁴ Further, the Act requires committees to disclose specific information on their campaign statements. For expenditures of \$100 or more, the committee must

¹The 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 85201, subd. (c) and (d).

³ Section 85201, subd. (e).

⁴ Section 84104 and Regulation 18401.

report the full name of each person to whom an expenditure is made, including payments made to an agent or independent contractor, commonly referred to as “subvendor payments,” of \$500 or more.⁵ Contributions made by an intermediary or agent of another must be disclosed on campaign statements, including the full name, street address, occupation, name of employer or the principal place of business if self-employed, of both the intermediary and the contributor.⁶

The Enforcement Division has completed its review of the facts of this case. Specifically, we found that the Committee, Freedman, and Slaton failed to comply with the one bank account provisions of the Act when they made campaign expenditures using a personal credit card, in the amount of \$1,393 and deposited cash in the amount of \$248 dollars, in contributions under \$100, into a personal bank account, which was later transferred to the Committee campaign bank account. Additionally, the Committee, Freedman, and Slaton failed to: maintain records for 15 contributions received through Venmo totaling \$1,555; disclose subvendor payments for payments made to Bergmann Zwerdling Direct totaling \$1,792 to the U.S. Post Office; and disclose the intermediary of 33 contributions totaling \$4,800 as received through ActBlue. However, the Enforcement Division has decided to close this case with a warning letter rather than a fine because the Committee, Freedman, and Slaton were unfamiliar with the requirements of the Act, this was the first time Slaton had acted as a treasurer for a committee, the FTB determined the Committee substantially complied with the requirements under the Act and there was no evidence of concealment, the Committee is now terminated, and there was no prior history of violating the Act.

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.

⁵ Section 84211, subd. (k).

⁶ Section 84302.

If you have questions regarding this letter, please contact me at bcastillo@fppc.ca.gov or (279) 237-3764.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division