



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

May 27, 2025

Chauncey Thompson, Candidate
Aaron Ortega, Treasurer
Thompson for Desert Healthcare District Director Zone 6 2022, Committee
Via email: [REDACTED]

**Warning Letter – FPPC No. 2023-00384; Thompson for Desert Healthcare District
Director Zone 6 2022; Chauncey Thompson, and Aaron Ortega**

Dear Respondents:

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 non-sworn complaint alleging that you failed to timely file pre-election campaign statements in connection with the November 8, 2022 General Election.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to timely file a Form 470 Supplement upon qualifying as a committee, failed to timely file the first pre-election campaign statement; failed to timely file a 24-Hour Contribution Report; failed to properly deposit personal funds into the campaign bank account prior to making three expenditures on advertisements during the second pre-election period; failed to timely file a post-election semiannual campaign statement; failed to timely file the 2023 first semiannual/termination campaign statement; failed to timely file a Form 410 Statement of Organization with the Secretary of State upon terminating the committee; failed to include the correct disclaimer on your committee’s Facebook page; and failed to include the correct disclaimer on paid Facebook advertisements in connection with your candidacy in the November 8, 2022 General Election.

The Act requires candidates to file a statement of organization (Form 410) to establish a candidate-controlled committee within 10 days of meeting the \$2,000 committee qualification threshold. For local candidate-controlled committees, the original Form 410 must be filed with the Secretary of State (SOS) and a copy must be filed with the local filing officer.² Additionally, the Act requires a candidate-controlled committee to file a subsequent statement of organization (Form 410 Termination) with the SOS upon terminating a committee.³

The Act requires candidates who anticipate soliciting or receiving contributions from others, or who anticipate spending \$2,000 or more in connection with their election, must open a campaign

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014.

² Section 84101.

³ Section 84214.

bank account at any established financial institution in California.⁴ All campaign contributions must be deposited into the campaign bank account.⁵ The Act requires that personal funds of the candidate which will be used to promote the election of the candidate, other than payments for a filing fee or statement of qualifications, must be deposited into the campaign bank account prior to expenditure.⁶

The Act also requires that candidates report their financial activity by filing campaign finance statements. The Act allows a candidate who does not have an open committee and does not plan to raise or spend \$2,000 or more in connection with the applicable election to file a Form 470 (Campaign Statement - Short Form) covering the entire calendar year by the first pre-election campaign statement deadline.⁷ The Act requires candidates or officeholders who filed a Form 470 and thereafter received contributions or made expenditures totaling \$2,000 or more, to send written notification (Form 470 Supplement) to the Secretary of State, the local filing officer, and each candidate for the same office within 48 hours of receiving or spending \$2,000 or more.⁸ After filing the Form 470 Supplement, the local candidate-controlled committee is responsible for filing a Recipient Committee Campaign Statement (Form 460) for each applicable period.

The Act requires candidate-controlled committees to file two pre-election campaign statements prior to the election in which the candidate is listed on the ballot.⁹ For the period ending 45 days before the election, the statement shall be filed no later than 40 days before the election.¹⁰ Additionally, the Act requires a candidate controlled committee to file two 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 31.¹¹ The obligation to file campaign statements continues until the candidate or treasurer terminates the committee. Controlling candidates and committee treasurers are jointly and severally liable for violations by the committee.¹²

Each candidate or committee that makes or receives a “late contribution” must file a 24-hour contribution report (“Form 497”) within 24 hours of making or receiving the contribution.¹³ In the case of a candidate who is on the ballot, a “late contribution” includes any contribution of \$1,000 or more that is received by the candidate or committee during the 90 days leading up to the election.¹⁴

The Act also regulates advertisement disclaimers, including those on social media platforms such as Facebook/Meta. The Act defines an online platform as a public-facing internet website, web application, or digital application, including a social network, ad network, or search engine, that sells advertisement directly to advertisers.¹⁵ The Act requires that a committee that disseminates

⁴ Section 85201, subdivision (a).

⁵ Section 85201, subdivision (b).

⁶ Sections 85201, subdivisions (d) and (f).

⁷ Sections 84206, subd. (c), and 84200.8; Regulation 18406.

⁸ *Ibid.*

⁹ Section 84200.5.

¹⁰ Section 84200.8, subd. (a).

¹¹ Section 84200, subd. (a).

¹² Sections 83116.5 and 91006.

¹³ Section 84203.

¹⁴ Section 82036.

¹⁵ Section 84504.6(a)(1).

an online platform disclosed advertisement, such as a Facebook sponsored advertisement, to notify the online platform that the advertisement is an advertisement defined in Section 84501 and provide the online platform with the disclosure name of the committee as it appears on the most recent statement of organization filed pursuant to Section 84101.¹⁶ The Act provides that social media pages made by candidate-controlled committees must include the disclaimer “Ad paid for by” followed by the name of the committee 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.¹⁷

You violated the Act because you failed to file your Form 470 Supplement by the due date of September 15, 2022; failed to timely file a 24-hour Contribution Report for a \$1,000 contribution by the September 15, 2022 deadline; failed to timely file the first pre-election campaign statement covering July 1, 2022 to September 24, 2022, by the September 29, 2022 deadline; failed to properly deposit personal funds into the campaign bank account prior to making expenditures for three advertisements during the second pre-election period; failed to timely file the semiannual campaign statement covering October 23, 2022 to December 31, 2022, by the January 31, 2023 deadline; failed to timely file the semiannual campaign statement covering January 1, 2023 to June 30, 2023 by the July 31, 2023 deadline; failed to timely file a Form 410 Statement of Organization with SOS upon terminating the committee on June 30, 2023; failed to include the “Ad paid for by” disclaimer on your committee’s Facebook landing page; and failed to use the appropriate advertisement disclaimer on seventeen paid Facebook advertisements.

The Enforcement Division has decided to close your case with a warning letter rather than a fine due to the following mitigating factors: you were prompt to respond when contacted by the Enforcement Division; you have filed your outstanding Form 470 Supplement and Form 410 termination statements; your first pre-election campaign statement was filed 33 days late but before the election; your advertisement expenditures using personal funds were disclosed on your timely filed second pre-election campaign statement; your advertisements on Facebook included the disclaimer, “Paid for by Chauncey Thompson,” which allowed for the public to have notice that you were responsible for the advertisements despite failing to include the full name of your committee as it appeared on your statement of organization; you corrected future advertisements on Facebook to include the required disclaimer; “Paid for by Thompson for Desert Healthcare District Director Zone 6 2022;” your post-election semiannual campaign statement was filed six days late; your 2023 first semiannual/Termination campaign statement was filed one day late; you have no prior enforcement history; you have a low level of experience with the Act; and you were an unsuccessful candidate in the election. Please note that while the Enforcement Division is closing this matter without a fine, your filing officer may assess late filing penalties.

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.

¹⁶ Sections 84504.6(b)(1) and (2)(A)(B).

¹⁷ Sections 84504.4, subd. (b) and 84504.3, subd. (h).

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 279-237-3754 or jevans@fppc.ca.gov.

Sincerely,

Jaleena Evans

Jaleena Evans, Attorney
Enforcement Division