



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

October 9, 2025

Paloma Carrillo, Candidate
Committee to Elect Paloma Carrillo Western Municipal Water District Board Division 1
Ron Hupe, Treasurer
Via email: [REDACTED]

Warning Letter – FPPC Case No. 2023-00424; Paloma Carrillo, Committee to Elect Paloma Carrillo Western Municipal Water District Board Division 1, Ron Hupe

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 an anonymous complaint alleging that you failed to timely disclose a \$1,000 contribution for your candidate-controlled committee, Committee to Elect Paloma Carrillo Western Municipal Water District Board Division 1 (“the Committee”), in connection with the November 8, 2022 election.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you and the Committee failed to timely file an amended Statement of Organization (Form 410) with the Secretary of State (“SOS”) and your local filing officer, failed to timely disclose a \$1,000 contribution on the first pre-election campaign statement (Form 460), failed to timely file a 24-hour Contribution Report (Form 497), and failed to timely file a post-election semiannual campaign statement (Form 460).

The Act requires candidates to file the 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

The Act also requires that candidates report their financial activity by filing campaign finance statements. Candidate-controlled committees must file two pre-election campaign statements prior to the election in which the candidate is listed on the ballot.³ For the period ending 45 days before the election, the statement shall be filed no later than 40 days before the election.⁴ 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

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

² Section 84101.

³ Section 84200.5.

⁴ Section 84200.8, subd. (a).

period ending December 31.⁵ 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.⁶

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.⁷ 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.⁸ A report disclosing receipt of a late in-kind contribution is considered timely filed if received within 48 hours of the time the contribution is received.⁹

You violated the Act because you failed to timely file an amended Form 410 Statement of Organization with SOS upon the Committee qualifying by the due date of September 9, 2022; failed to timely file a 24-hour Contribution Report for a \$1,000 contribution by the August 15, 2022 due date; failed to timely disclose the contribution on the first pre-election campaign statement covering July 1, 2022 to September 24, 2022 by the September 29, 2022 deadline; and failed to timely file the semiannual campaign statement covering October 23, 2022 to December 31, 2022 by the January 31, 2023 deadline.

The Enforcement Division has decided to close your case with a warning letter rather than a fine due to the following mitigating factors: you filed the amended Form 410 prior to the election; you amended the first pre-election campaign statement to disclose the contribution prior to the election, and the 24-Hour Contribution Report was also filed before the election; your post-election semiannual campaign statement had low activity and the amount disclosed was a small percentage of overall activity; Carrillo and the Committee have no prior Enforcement history; Carrillo has a low level of experience with the Act; and Carrillo was 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.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 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 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

⁵ Section 84200, subd. (a).

⁶ Sections 83116.5 and 91006.

⁷ Section 84203.

⁸ Section 82036.

⁹ Section 84203.3.

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 Franceska Gonzalez at fgonzalez@fppc.ca.gov or (279) 237-5993.

Sincerely,

Franceska Gonzalez

Franceska Gonzalez, Attorney
Enforcement Division