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

July 7, 2026

Margaret Fisher
Citizen's Committee for Yes on Prop 50
Via email: [redacted]

Warning Letter re FPPC No. 2025-01190; In the Matter of Citizen's Committee for Yes on Prop 50, Margaret Fisher

Dear all,

The Enforcement Division of the Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act (the "Act"). As you are aware, the Enforcement Division received an anonymous complaint against Citizen's Committee for Yes on Prop 50 ("the Committee"). Specifically, the complaint attached an image of the Committee's billboard advertisement and alleged that the Committee had violated print advertisement disclaimer rules and had likely failed to file late contribution reports. The Enforcement Division has completed its investigation and review and will close the matter with this letter.

The Act has a comprehensive reporting system, intended to provide transparency and disclosure of political activity of the persons who make contributions and how committees spend these contributions. A committee, including a primarily formed ballot measure committee such as Citizen's Committee for Yes on Prop 50, is required to file campaign statements and reports until the Committee has terminated. These reports are due twice a year on July 31 and January 31, as well as during pre-election reporting periods in the lead-in to an election. Additionally, during the 90 days before an election committees must report certain expenditures and received contributions within 24 hours of making the expenditure or receiving the contributions. Finally, campaign advertisements made by committees are subject to specific advertisement disclaimer rules.

The investigation found six violations of the Act, which are enumerated below.

First, the investigation found that the Committee committed a violation of the Act by erroneously marking that it had not yet qualified as a committee on its statement of organization. According to its campaign statement filings, the Committee qualified as a committee on September 11, 2025, when it reached $2,000 in received contributions. (Gov. Code § 82013(a).) The initial Form 410 statement of organization, signed and dated September 16, 2025 and received by the SOS on September 19, 2025, indicated on page 1 that the filer had "not yet qualified" as a committee. The Committee was required to amend the statement of organization to disclose the date of qualification within 10 days of qualifying. By failing to file a conforming statement of organization by September 21, 2025, the Committee violated Section 84101 of the Act.

Second, the investigation found that the Committee committed a violation of the Act by failing to timely file a 24-hour Independent Expenditure Report. A committee that makes independent expenditures of $1,000 or more that support or oppose a state ballot measure within the 90 days before the date of the measure's election must disclose the expenditure on a Form 496 24-hour Independent Expenditure Report filed within 24 hours of the expenditure being made. (Gov. Code § 84204.) The payment for the billboard advertisement, which was an independent expenditure, was made within the 24-hour reporting period of August 21, 2025 – November 4, 2025, and therefore should have been reported on a Form 496 Independent Expenditure Report within 24 hours. (Gov. Code §82036.5; Gov. Code § 84204(a).) This expenditure was, however, disclosed on the Committee's campaign statement before the election.

Third, the investigation found that the Committee committed a violation of the Act by failing to timely file a 24-hour contribution report. A committee primarily formed to support or oppose a state ballot measure committee must report a contribution of $1,000 or more that is received within the 90 days before the election in which that ballot measure appears on a Form 497 24-hour contribution report (Gov. Code §82036; Gov. Code §84203(a).) The committee received a $4,900 contribution from E. Jane Akers on September 21, 2025, which as above was within the 24-hour reporting period that began on August 21, 2025. Therefore, the Committee should have filed a Form 497 24-hour report for this contribution by September 22, 2025. The Committee reported this contribution on its campaign statement that was filed on October 15, 2025.

For the fourth and fifth violations, the investigation found that the Committee violated the Act by failing to timely file campaign statements for the 1st pre-election and 2nd pre-election periods. As a committee that formed on September 11, 2025 and was primarily formed to support a ballot measure that appeared on the November 2025 special election, the respondent was required to file campaign statements for the periods of 1st pre-election (covering January 1, 2025-September 20, 2025 and due September 25, 2025), 2nd pre-election (covering September 21, 2025-October 18, 2025 and due October 23, 2025), semi-annual for second semester of 2025 (covering October 19, 2025-December 31, 2025 and due February 2, 2026), and semi-annual for first semester 2026 (covering January 1, 2026 until the termination date of January 27, 2026).

The Committee filed its first reports with dates incorrectly marked. On October 10, 2025, the committee filed a campaign statement marking covered dates of January 1, 2025-October 1, 2025. Then on October 15, 2025, the committee filed a 460 dated September 10, 2025-October 10, 2025. On October 24, 2025, the committee filed a 460 dated October 10, 2025-October 23, 2025. So in effect, the 1st pre-election report was filed 15 days late and the 2nd pre-election report was filed one day late. The other reports were filed on time, although the semi-annuals for second semester 2025 and first semester 2026 were incorrectly combined upon the initial submission on February 2, 2026. (Gov. Code § 84200; § 84200.5). All the Committee's reportable activity was disclosed on the two campaign statements filed before the election on October 10 and October 15.

Sixth and finally, the investigation found that the Committee's billboard advertisement referenced in the complaint violated the Act's advertisement disclaimer rules for print advertisements. The billboard included a disclaimer box, which read "Ad Paid for by Citizen's

Committee for Yes on Prop 50." This box was not at the bottom of the advertisement, however, as below it was a line of text reading "California is Fighting Back!" (Gov. Code § 84502; Gov. Code in Gov. Code 84504.2(a)(1).) Nevertheless, the Committee was clearly identified as the funder of the advertisement and other formatting rules, such as the text-box, font, 5-percent-height, and contrast rules, were followed.

These violations, however, caused minimal public harm, as the Committee expended less than $10,000, reported all activity before the election, and clearly identified itself as the funder on its one independent expenditure advertisement. Furthermore, the Committee had a lack of experience with the Act, had received no warning letters or administrative penalties from the Commission, made good-faith attempts to comply with the Act's requirements, and was responsive and cooperative with the investigation. Therefore, the Enforcement Division will close this matter 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.

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.

For more information on campaign filing requirements, visit our website at www.fppc.ca.gov. Should you have any questions regarding this letter, please feel free to contact me at jblattner@fppc.ca.gov or by phone at (279) 237-5922.

Sincerely,

Jack Blattner

Jack Blattner
Commission Counsel, Enforcement Division