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

October 12, 2026

Tim Herode for Governor 2022
Tim Herode (Candidate / Treasurer)

Via email: [redacted]

Warning Letter re FPPC No. 2026-00465; Tim Herode for Governor 2022, Tim Herode

Dear Tim Herode and Committee:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").[1] As you are aware, the Enforcement Division has received a referral from the Franchise Tax Board's ("FTB") Political Reform Audit Program resulting from an audit of Tim Herode for Governor 2022 (the "Committee"), as a statewide committee who raised or spent $25,000 or more and was subject to audit.

The FTB audit concluded that the Committee violated the Act by failing to timely file two Form 460 semi-annual campaign statements. Additionally, the FTB audit concluded that the Committee failed to file both Form 460 semi-annual campaign statements in electronic format with the California Secretary of State's Office.

The Act requires state candidate controlled committees that cumulatively receive contributions or make expenditures totaling twenty-five thousand dollars ($25,000) to file semi-annual campaign statements electronically and in paper format, with the Secretary of State each year no later than July 31 for the period ending June 30 and January 31 for the period ending December 31.[2] The obligation to file semi-annual campaign statements continues until the treasurer terminates the committee.

Your actions violated the Act because you failed to timely file, in paper and electronic format, the semi-annual campaign statements for the reporting periods of July 1, 2021 through December 31, 2021 and January 1, 2022 through June 30, 2022, by the January 31, 2022 and July 31, 2022 deadlines, respectively. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine because you had a low level of experience, which lead to the multiple violations, the committee terminated, you were unsuccessful in obtaining office, the

[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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

[2] Sections 84605 and 84200.

semi-annual statement ending December 31, 2021 was filed 12 days before the election, the semi-annual statement ending June 30, 2022 was unrelated to the election because you failed to qualify for the ballot for the June 7, 2022 primary election. Additionally, for both late filed reports there was minimal activity. Lastly, the Committee has no prior Enforcement history. 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 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.

Please feel free to contact Chance Felkins at cfelkins@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Michael Chance Felkins

Michael Chance Felkins, Commission Counsel
Enforcement Division