



STATE OF CALIFORNIA

FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

September 14, 2026

Joel Aurora

o/b/o California Alliance of Family Owned Businesses PAC

Via email: JAurora@nmgovlaw.com

Warning Letter re FPPC No. 2026-00645; California Alliance of Family Owned Businesses PAC

Dear Committee:

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 an advertisement by the California Alliance of Family Owned Businesses PAC (the “Committee”), failed to include the proper disclaimer. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that the Committee failed to include the proper disclaimer on a video advertisement.

Under the Act, “top contributors” means the persons from whom the committee paying for an advertisement has received its three highest cumulative contributions of fifty thousand dollars (\$50,000) or more.² Under the Act, advertisements paid for by general purpose committee are required to include the words “Ad Committee’s Top Funders” unless only one contributor qualifies as a top contributor, in which case the advertisement shall include the words “Ad Committee’s Top Funder” followed by the names of the top contributors to the committee paying for the advertisement.³ If a disclosure statement required by a local ordinance is substantially similar to a disclosure statement required pursuant to this article, the two disclosure statements may be merged into a single statement.⁴

Your client’s actions violated the Act because the Committee failed to include the proper disclaimer on their advertisement. However, the Enforcement Division has determined that mitigating circumstances are present here and has decided to close this case with a warning letter rather than a fine for the following reasons: the error was the failure to use the precise disclaimer language but the remainder of the disclosure was correct, there was no evidence of an intent to violate the Act or conceal the violations; the public harm was low; and the Committee does not have prior Enforcement history.

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 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 84201(c)(1).

³ Section 84503.

⁴ Section 84504.8.

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.

Although we are closing our file, please be advised of the provisions in the Act and regulations regarding campaign-related communications. If you need additional guidance, you may contact the Commission's Advice team by sending an email to advice@fppc.ca.gov. There is also information pertaining to campaign-related communications and advertisement disclosure requirements available on the Commission's website at www.fppc.ca.gov

If you have any questions regarding this letter, please contact me at jrivera@fppc.ca.gov or (279) 237-5913.

Sincerely,

Jonathan Rivera

Jonathan Rivera
Commission Counsel
Enforcement Division