



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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Fourth Quarter Update

Campaign Reporting and Advertising Disclosure

Regulations adopted by the Commission.

The following are regulatory changes approved by the Commission during the past quarter concerning campaign reporting or advertising disclosure. To receive updates for all regulations before the Commission, please sign up for our [mailing list here](#).

None.

Advice Letters

The following are advice letters issued by the Commission's Legal Division during the past quarter concerning questions about campaign reporting or advertising disclosure. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Section 84308

Amanda Freeman

[A-23-145](#)

Although the contract never came before the City Council for the Councilmembers' consideration, a contract for ambulance services executed by the City Manager was a decision "by the agency" for purposes of Section 84308. Thus, the contracting party is prohibited from making any contribution greater than \$250 to a councilmember for 12 months following the date the final decision was rendered.

Inna Zazulevskaya

[I-23-157](#)

The sale of property by Board of Supervisors pursuant to the competitive bidding requirements of Section 25520, *et seq.* (which include public notice, resolution with a stated minimum sale price, sale terms, set time for consideration of the bids, and that the contract be awarded to the highest responsible bidder or that all bids be rejected and the property pulled from sale) meets the definition of a "competitively bid contract" that is not subject to the requirements and restrictions in Section 84308.

Commission Opinions

None.

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter involving violations of the Act's campaign reporting and advertising disclosure provisions. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

Campaign Reporting

[In the Matter of Elizabeth Alcantar, Alcantar for City Council 2018, and Oscar Moreno; FPPC No. 18/1142.](#) Staff: Jenna C. Rinehart, Commission Counsel and Roone Petersen, Special Investigator. The respondents were represented by Latrice Burks of Larson LLP. Elizabeth Alcantar was a successful candidate for Cudahy City Council in the November 6, 2018 General Election. Alcantar for City Council 2018 is Alcantar's controlled committee. Oscar Moreno serves as the Committee's treasurer. Alcantar failed to timely file a statement of intention prior to the solicitation or receipt of any contributions or loans, in violation of Government Code Section 85200 (1 count). The Committee failed to timely file an amendment to its statement of organization to disclose its date of qualification, in violation of Government Code Section 84103 (1 count). Additionally, the Committee failed to timely file a 24-hour contribution report and three semi-annual campaign statements, in violation of Government Code Sections 84203 and 84200 (4 counts). Lastly, as a City Council member, Alcantar failed to timely file the 2019 and 2020 Annual SEIs, in violation of Government Code Section 87203 (2 counts). **Fine: \$7,327 (Tiers One & Two).**

[In the Matter of Christine Salazar for School Board 2020; Christine Salazar; FPPC No. 20/959.](#) Staff: Alex Rose, Commission Counsel. Christine Salazar was a successful candidate for Hacienda La Puente School Board in the November 3, 2020 General Election. Christine Salazar for School Board 2020 was Salazar's candidate-controlled committee. The Committee and Salazar failed to timely file six semi-annual campaign statements and one 24-hour contribution report, in violation of Government Code Sections 84200 and 84203 (7 counts). **Fine: \$1,692 (Tier One).**

[In the Matter of Vikrum Aiyer; FPPC No. 23/450.](#) Staff: James M. Lindsay, Chief of Enforcement and Ginny Brown, Political Reform Consultant. The respondent was represented by Jim Sutton of the Sutton Law Firm. Vikrum Aiyer, a major donor committee for the calendar year 2022, failed to file five 24-hour reports, in violation of Government Code Section 84203 (5 counts). **Fine: \$2,000 (Tier One).**

[In the Matter of Dublin Teachers Association Political Action Committee, Nancy Karell; FPPC No. 22/743.](#) Staff: Alex Rose, Commission Counsel and Kristin Hamilton, Special Investigator. Dublin Teachers Association PAC is a local general purpose committee. Nancy Karell served as the Committee's treasurer. The Committee and Karell failed to timely file three semi-annual and two pre-election campaign statements, in violation of Government Code Section 84200 and 84200.5 (5 counts). **Fine: \$1,083 (Tier One).**

[In the Matter of Committee to Elect Robert Ocampo Board Member, Alisal Union Elementary School, District Area 2 2022, Robert Ocampo, and Sandra Ocampo; FPPC No. 23/036.](#) Staff: James M. Lindsay, Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Robert Ocampo was a successful candidate for the Alisal Unified School District Board of Trustees in the November 8, 2022 General Election. Committee to Elect Robert Ocampo Board Member, Alisal Union Elementary School, District Area 2 2022 was their candidate-controlled committee. Sandra Ocampo served as the Committee's treasurer. The Committee, Ocampo, and Ocampo failed to timely file one 24-hour report, in violation of Government Code Section 84203 (1 count). **Fine: \$265 (Tier One).**

Advertisements

In the Matter of Our Republic Our Future; FPPC No. 22/694. Staff: Alex Rose, Commission Counsel and Alethea Perez, Special Investigator. The respondent is represented by Tal Finney of Finney Arnold, LLP. Our Republic Our Future is an independent expenditure committee. Michael Kipp is the Committee's treasurer and principal officer. The Committee and Kipp failed to include the proper advertising disclosure on a mailer distributed prior to the November 8, 2022 General Election, in violation of Government Code Sections 84502 and 84506.5 (2 counts). In addition, the Committee and Kipp failed to timely file an independent expenditure committee campaign statement and a 24-hour independent expenditure report for the mailers above, in violation of Government Code Sections 84200 and 84204 (2 counts). **Fine: \$3,066 (Tier Two).**

In the Matter of No on Prop 22, sponsored by Labor Organizations, Art Pulaski; FPPC No. 23/445. Staff: Alex Rose, Commission Counsel and Lance Hachigian, Special Investigator. The respondents are represented by Kelly Liang of Olson Remcho. No on Prop 22, sponsored by Labor Organizations was a local primarily formed committee. Art Pulaski was the Committee's treasurer. The Committee and Pulaski failed to include the proper advertising disclosures on two flyers distributed prior to the November 3, 2020 General Election, in violation of Government Code Sections 84502 and 84503 (2 counts). **Fine: \$844 (Tier Two).**

Legislation

None.