



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

July 30, 2019

Ruth McGee Hewitt
California Association of School Business Officials PAC
1001 K Street, 5th Floor
Sacramento, CA 95814
Via Email: jbustamante@casbo.org

Warning Letter Re: FPPC No. 2018-00273; California Association of School Business Officials PAC and Ruth McGee Hewitt

Dear California Association of School Business Officials PAC and Ms. McGee Hewitt:

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 a referral from the Secretary of State's Office alleging that California Association of School Business Officials PAC (the "Committee") failed to timely file two semi-annual campaign statements in paper format.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that the Committee failed to timely file two semi-annual campaign statements for the reporting periods of July 1, 2016 through December 31, 2016, and January 1, 2017 through June 30, 2017, in paper format.

The Act requires general purpose committees to file 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 period ending December 31.² A general purpose committee that cumulatively receives contributions or makes expenditures totaling twenty-five thousand dollars (\$25,000) or more to support or oppose candidates for any elective state office or state measure is required to file campaign statements online or electronically with the Secretary of State.³ Persons filing online or electronically are also required to continue to file statements and reports in paper format.⁴

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 Section 84200, subd. (a).

³ Section 84605, subd. (a)(2).

⁴ Section 84605, subd. (f).

Your actions violated the Act because you failed to timely file two semi-annual campaign statements for the reporting periods of July 1, 2016 through June 30, 2017, in paper format. However, the Enforcement Division has decided to close this case with a warning letter because you filed the required campaign statements after being contacted by the Enforcement Division. Additionally, you timely filed the statements in question in electronic format and reported no activity. Moreover, you do not have a history of prior violations of the Act.

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.

If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact Dominika Wojenska at dwojenska@fppc.ca.gov or (916) 322-2043 with any questions you may have regarding this letter.

Sincerely,



Galena West, Chief
Enforcement Division

GW/dw

cc: Secretary of State's Office