



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811  
(916) 322-5660 • Fax (916) 322-0886

February 13, 2019

William P. “Bill” Brough  
Bill Brough for State Assembly 2016 (1373595)  
34145 Pacific Coast Highway #214  
Dana Point, CA 92629

Jen Slater  
Campaign Compliance Group, Inc.  
9070 Irvine Center Drive #150  
Irvine, CA 92618

**Warning Letter re: FPPC Case No. 2018-01225; Bill Brough for State Assembly 2016; Brough, Slater**

Dear Mr. Brough and Ms. Slater:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This letter is in response to a referral the Enforcement Division received from the Franchise Tax Board’s (“FTB”) Political Reform Audit Program resulting from an audit of your committee, Bill Brough for State Assembly 2016, for the period of January 1, 2014 through December 31, 2016.

The FTB audit report concluded that the Committee substantially complied with the Act’s disclosure and recordkeeping provisions, but that the Committee did violate the Act by using campaign funds that were not related to a political, legislative or governmental purpose. The Committee reported nine transactions totaling \$3,572 from July 4, 2016 through July 11, 2016 for travel costs during a trip to Paris, France, in violation of Government Code Section 89510 and 89512.

Despite the violation, the Enforcement Division has determined that further enforcement action is not warranted because the FTB audit report concluded that the Committee substantially complied with the Act. Also, it was later determined by the campaign attorney that campaign funds could not be used to pay for these expenses, and they were reimbursed by the candidate on September 22, 2016 before contact from FTB or the Enforcement Division.

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<sup>1</sup> 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.

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. But the warning letter resolution does not provide the Committee with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If the Committee wishes to avail itself of these proceedings by requesting that its 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 visit our website at [www.fppc.ca.gov](http://www.fppc.ca.gov). Please feel free to contact Shaina Elkin at [selkin@fppc.ca.gov](mailto:selkin@fppc.ca.gov) with any questions you may have regarding this letter.

Sincerely,



Galena West  
Chief, Enforcement Division

cc: Franchise Tax Board

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