

Joel Pablo

From: Joel Pablo
Sent: Wednesday, August 6, 2025 5:42 PM
To: Lydia Romero; Steinke, Kristen S.
Subject: FYI - FPPC Disclosure Requirements Related to Recall Contributions and Gifts

Hi, Lydia & Kristen -

I sent the below communication to Ken King today in response to a question he raised on Monday, July 28, 2025.

During our discussion, he asked specific questions to better understand his reporting obligations. He described the recall effort as a “grassroots” initiative and indicated that Phase 1 (commencing with the NOI) of the process and any future campaign activity should it get that far would be funded through “donations.” He mention that this would include both monetary and if it gets that far non-monetary contributions (to include signage, etc).

I provided Ken King with a copy of my June 2025 email outlining his filing obligations. He was given Form 410, Form 460, Form 470, and a Local Candidate/Committee Checklist. I also directed him to specific FPPC resources, including staff contact information, upcoming training opportunities, and how to register for them. During our conversation, I briefly explained the purpose of each form and encouraged him to review FPPC filing requirements, visit the FPPC website, and take advantage of available formal training opportunities.

I sent him the below e-mail, so he is aware of his reporting requirements regardless if they were “donated” and a “grassroots” effort.

- Joel G. Pablo, City Clerk with the City of Lemon Grove
Direct: (619) 825-3841

From: Joel Pablo
Sent: Wednesday, August 6, 2025 2:28 PM
To: Ken King [REDACTED]
Subject: FPPC Disclosure Requirements Related to Recall Contributions and Gifts

Hello, Mr. King:

As the designated proponent of the recall effort against Mayor Alysson Snow, I wanted to take a moment to provide you with general information regarding state-mandated disclosure requirements related to contributions and gifts associated with recall activities. Under the Political Reform Act (California Government Code § 81000 et seq.), individuals or committees involved in recall efforts are subject to campaign finance reporting obligations enforced by the Fair Political Practices Commission (FPPC). Specifically:

► **Monetary and Non-Monetary Contributions**

- All monetary contributions received in support of the recall must be reported if they cumulatively total \$100 or more from a single source.
- Non-monetary contributions such as donated goods or services (e.g., signs, advertising, food, printing, or professional services) must also be reported and assigned a reasonable fair market value.

► Relevant Statutory and Regulatory Citations

- Government Code § 84211(f) requires that campaign statements disclose the name, address, occupation, and employer of any contributor giving \$100 or more in a calendar year.
- FPPC Regulation 18421.1 clarifies that non-monetary contributions must be disclosed at their fair market value, even if no money changed hands.
- Government Code § 82015 defines a “contribution” broadly to include both monetary donations and non-monetary gifts provided for a political purpose, including recall activities.

🎓 FPPC Training Resources

To support your compliance efforts, the FPPC offers a variety of online training opportunities, which are highly recommended for recall proponents and campaign treasurers.

You may access:

- General Campaign Training and Webinars: <https://www.fppc.ca.gov/learn/training-and-outreach.html>
- Upcoming Live and Virtual Training Sessions: <https://www.fppc.ca.gov/learn/training-and-outreach/upcoming-training-opportunities.html>

These training opportunities cover campaign reporting basics, filing obligations, gift and contribution disclosures, and use of FPPC forms.



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Lemon Grove, CA 91945

For legal advice or specific filing obligations, you may also wish to contact the FPPC directly at (866) 275-3772 or advice@fppc.ca.gov.

Joel G. Pablo
City Clerk

City of Lemon Grove

Phone: 619-825-3841

3232 Main St.

City Hall Hours are Monday to Thursday, 7:00am – 6:00pm

CLOSED EVERY FRIDAY

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Disclosure:

This communication is being provided by the City Clerk in the capacity of Elections Official for the City of Lemon Grove for informational purposes only. It is intended to assist with general understanding of campaign filing and disclosure obligations as governed by the California Elections Code, the Political Reform Act (Government Code § 81000 et seq.), and regulations of the Fair Political Practices Commission (FPPC).

Please note that this communication does not constitute legal advice and should not be relied upon as such. Individuals or committees involved in a recall or other campaign activity are encouraged to consult directly with the FPPC at (866) 275-3772 or advice@fppc.ca.gov, or to seek independent legal counsel, for guidance specific to their situation or compliance requirements. The City Clerk’s role is ministerial and administrative with respect to election procedures. The City Clerk is not authorized to interpret the law, provide legal determinations, or confirm compliance with FPPC filing obligations.