

Joel Pablo

From: Joel Pablo
Sent: Saturday, June 21, 2025 2:02 PM
To: Ken King
Subject: FPPC Filing Requirements for Recall Proponents

Dear Ken King:

This letter serves as a courtesy notice to remind you of your responsibilities under the Political Reform Act as administered by the Fair Political Practices Commission (FPPC) in connection with your recall effort in the City of Lemon Grove.

As a proponent of a recall, you may be required to comply with state campaign disclosure requirements if you engage in activities that qualify as making or receiving contributions or expenditures. The following filings are generally required:

1. Statement of Organization (Form 410)

If you receive contributions or make expenditures totaling \$2,000 or more in connection with the recall effort, you must file Form 410 (Statement of Organization) with the Secretary of State and provide a copy to the City Clerk's Office. This form must be filed within 10 days of qualifying as a committee. Once filed, you will receive a Committee ID number from the FPPC.

<https://fppc.ca.gov/forms.html>

2. Campaign Disclosure Statements (Forms 460 or 470)

Depending on your level of activity:

- If you raise or spend \$2,000 or more, you must file Form 460 (Recipient Committee Campaign Statement) on a semi-annual basis or according to the FPPC's established deadlines.
- If you do not raise or spend \$2,000 or more during a calendar year, but still qualify as a candidate or committee, you may be eligible to file Form 470 (Officeholder and Candidate Campaign Statement – Short Form) instead.

These forms must be filed with the City Clerk and, if applicable, other agencies designated in the FPPC filing schedule.

<https://fppc.ca.gov/forms.html>

3. Other Requirements

Please also be aware of:

- **Advertisement Disclosures and Disclaimers** on campaign materials (Gov. Code § 84305).
- **Recordkeeping Requirements** for all contributions and expenditures.
- **Contribution Limits and Prohibitions**, as applicable.

4. Regulation 18531.5 – Recall Elections ([https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/LegalDiv/Regulations/Index/Chapter5/%C2%A7%2018531.5.%20Recall%20Elections.\(amended%2012-17-22\).pdf](https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/LegalDiv/Regulations/Index/Chapter5/%C2%A7%2018531.5.%20Recall%20Elections.(amended%2012-17-22).pdf))

Under Title 2, California Code of Regulations, Section 18531.5, the FPPC outlines that any individual or entity making contributions or expenditures related to a recall effort may be treated as a committee under the Political Reform Act. This means campaign filing requirements apply not only to the recall of an elected official but also to supporting or opposing candidates who may be running in the replacement election, should one occur. Proponents should be aware that both phases of the election: the recall question and the potential successor election may trigger additional filing obligations. You may access the necessary forms, instructions, and filing schedules directly through the FPPC's website at www.fppc.ca.gov. You are strongly encouraged to consult the FPPC or a qualified campaign compliance advisor to ensure full compliance with all state laws and regulations.

5. FPPC Upcoming Webinars & Workshops

According to the FPPC's Upcoming Training Opportunities page, these sessions are open to the public and free to attend.

<https://www.fppc.ca.gov/learn/training-and-outreach/upcoming-training-opportunities.html>

These sessions are hosted by the FPPC's Education & External Affairs Unit and registration links are available through their site (links close at 4:00 p.m. the day before each event)

DISCLAIMER: Please note that it remains your sole responsibility and that of any associated committee to ensure compliance with all applicable campaign reporting requirements under state law. You are strongly encouraged to consult with the FPPC directly or with a qualified campaign compliance professional for official advice and interpretation of the regulations.

If you have any questions related to local filing requirements, please contact me directly at (619) 825-3841 or via email at jpablo@lemongrove.ca.gov



Joel G. Pablo
City Clerk / Elections Official

City of Lemon Grove

Phone: 619-825-3841

3232 Main St.

Lemon Grove, CA 91945

"Best Climate on Earth"

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

CLOSED EVERY FRIDAY

Confidentiality Notice: Please note that email correspondence with the City of Lemon Grove, along with any attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt.

Joel Pablo

From: Joel Pablo
Sent: Wednesday, August 6, 2025 2:28 PM
To: 'Ken King'
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.

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

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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.