

**SWORN COMPLAINT FORM**  
**(Form May Be Subject to Public Disclosure)\***

**AS REQUIRED BY GOVERNMENT CODE SECTION 83115**, please complete the form below to file a sworn complaint with the Fair Political Practices Commission.

Mail the complaint to:

**Enforcement Division**  
**Fair Political Practices Commission**  
**428 J Street, Suite 620**  
**Sacramento, CA 95814**

***NOTE:*** *The Fair Political Practices Commission does not enforce or address violations of the Brown Act, the content of campaign communications, residency requirements, the inappropriate use of public funds or resources (including use of uniforms or equipment), placement of campaign signs or materials on public property, or violation of a local campaign rule or campaign ordinance.*

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**Person Making Complaint**

Last Name: Glazer

First Name: Steve

Street Address: 23 Orinda Way #305

City: Orinda State: CA Zip: 94563

Telephone: (925 ) 254 -2400

Fax: ( ) -

E-mail: glazers@pacbell.net

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**\*IMPORTANT NOTICE**

**Under the California Public Records Act (Gov. Code Section 6250 and following), this sworn complaint and your identity as the complainant may be subject to public disclosure. Unless the Chief of Enforcement deems otherwise, within three business days of receiving your sworn complaint we will send a copy of it to the person(s) you allege violated the law.**

**In some circumstances, the FPPC may claim your identity is confidential, and therefore not subject to disclosure. A court of law could ultimately make the determination of confidentiality. If you wish the FPPC to consider your identity confidential, do not file the complaint before you contact the FPPC to discuss the complaint at (916) 322-5660 or toll free at (866) 275-3772.**

**\*IMPORTANT! Attach copies of any available documentation that is evidence of the violation, (for example, copies of checks, campaign materials, minutes of meetings, etc., if applicable to the complaint.) Note that a newspaper article is NOT considered evidence of a violation.**

**Complaint Against “Working Families Opposing Glazer for Senate 2015” –  
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**Describe, With as Much Particularity as Possible, the Facts Constituting the Alleged Violation(s) and How You Have Personal Knowledge that it Occurred.\***

On or about March 24, 2015, Working Families Opposing Glazer for Senate 2015 Sponsored by Labor Organizations (hereinafter WFOG) filed Form 496 Late Expenditure Report No. 14556. Three pages long, Report No. 14556 is attached and incorporated into this complaint as Exhibit A.

Exhibit A, Section 3, Contributions of \$100 or More Received, says that on “3/20/2015,” WFOG had “amount received” of “\$150,000” from “California State Council of Service Employees Political Action Committee,” “\$50,000” from “PACE of California School Employees Association,” and “\$50,000” from “Service Employees International Union Local 1000 Candidate PAC.”

Exhibit A, Section 2, Independent Expenditures Made, says that on “3/24/2015,” WFOG expended “\$34,747.91” on “Mailer Memo Reference: PDT:\$496.43.”

On Friday, March 27, 2015, a Rossmoor/Walnut Creek resident informed my campaign office by telephone that he had received a mailer from WFOG bearing the code “WFOG15008” and the message, “STEVE GLAZER CAN’T BE TRUSTED.” On Saturday, March 28, 2015, I received a copy of “WFOG15008” addressed to me in my Orinda mailbox. Digital scans of this two-sided mailer are attached to and hereby incorporated into this complaint as Exhibit B.

I have personal knowledge of the violation because I have reviewed Exhibit B (WFOG15008) and observed that it does not contain any form of disclosure statement bearing the name of any committee that contributed \$50,000 or more. I also have personal knowledge because I have reviewed Exhibit A (Report No. 14556), which indicates that at least three committees each had contributed \$50,000 or more to WFOG as of March 20, 2015, four days before WFOG made the expenditure for this mailer (Exhibit B) on March 24, 2015.

**Occurred: (If specific sections are not known, please provide a brief summary)**  
See attached page: "Complaint Against 'Working Families Opposing Glazer for Senate 2015'"

*(This area contains horizontal ruling lines.)*

**Name and Addresses of Potential Witnesses, Other than Yourself, if Known:**

Street Address:

E-mail: \_\_\_\_\_

**Complaint Against “Working Families Opposing Glazer for Senate 2015” –  
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**Provision(s)/Section(s) of the Political Reform Act Allegedly Violated and  
When the Violation(s) Occurred: (If specific sections are not known, please  
provide a brief summary)**

The Working Families Opposing Glazer for Senate 2015 Sponsored by Labor Organizations committee has violated California Government Code §84506(a), which states, "An advertisement supporting or opposing a candidate or ballot measure, that is paid for by an independent expenditure, shall include a disclosure statement that identifies both of the following: (1) The name of the committee making the independent expenditure. (2) The names of the persons from whom the committee making the independent expenditure has received its two highest cumulative contributions of fifty thousand dollars (\$50,000) or more during the 12-month period prior to the expenditure." Government Code §84507 says, "Any disclosure statement required by this article shall be printed clearly and legibly in no less than 10-point type and in a conspicuous manner as defined by the commission ..."

Furthermore, California Code of Regulations, Title 2, §18450.4(b)(1) says in part, "disclosure required by Sections 84503 and 84506 shall include the name, pursuant to Regulation 18450.3, of the \$50,000 contributor or contributors. The disclosure shall explicitly indicate that the contributor or contributors were major donors to the committee by stating, for example, "major funding by" "committee contributors:" or "top contributors:" C.C.R., Title 2, §18450.4(b)(3) says in part, "The disclosures shall be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of the identity of the person(s) or committee(s) that paid for the communication, as specified below. ... (C) Print Media: All disclosure statements on printed materials designed to be distributed personally or through the mail shall be printed in type no less than 10 points in size and printed in a contrasting color to the background on which it appears."

Report No. 14556 (Exhibit A) indicates that the violation occurred on March 24, 2015, the date when WFOG made the independent expenditure for this mailer (Exhibit B), which was four days after WFOG received contributions of \$150,000, \$50,000, and \$50,000 from three separate committees on March 20, 2015, each of which independently triggered the Government Code §§84506(a)(2) and 84507 and C.C.R. Title 2, §18450.4 disclosure requirements.

Last Name: \_\_\_\_\_

First Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_

Fax: (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_

E-mail: \_\_\_\_\_

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Last Name: \_\_\_\_\_

First Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_

Fax: (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_

E-mail: \_\_\_\_\_

**I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.**

Steve Glazer 3-31-15  
(Signature) (Date)

Steve Glazer  
(Please Print Your Name)

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