

Charles H. Bell, Jr.  
1649 Helena Street  
Arroyo Grande, CA 93420-5342

BY U.S. MAIL AND ELECTRONIC MAIL

Fair Political Practices Commission  
Enforcement Division  
1102 Q Street, Suite 3050  
Sacramento, CA 95811

Email: [Complaint@fppc.ca.gov](mailto:Complaint@fppc.ca.gov)

Response by Adam Verdin & Adam Verdin for Supervisor 2026  
Complaint by Supervisor Jimmy Paulding (San Luis Obispo County)

Commission Intake Coordinator and Counsel:

The undersigned submits this response to a **false and meritless** complaint that may have been filed by San Luis Obispo County Supervisor Jimmy Paulding within the past five days against Adam Verdin, his currently opponent for Supervisor at the June 2026 primary election. The complaint misstates applicable law and the claimed violation of the local law and the Political Reform Act. The complaint is patently an abuse of the Commission's enforcement process. It contains no relevant facts that would establish a probability that the Act was violated. It should be dismissed forthwith.

I have filed this response in my personal capacity as a resident and registered voter of the 4<sup>th</sup> Supervisorial District of San Luis Obispo County and honorary campaign chair of the Adam Verdin campaign, having retired from the California State Bar after nearly 40 years of active practice before the FPPC itself. Responses or inquiries should be addressed to me at the address above and to my personal email, [charles.h.bell.jr@gmail.com](mailto:charles.h.bell.jr@gmail.com), and not to the Bell, McAndrews & Hiltachk, LLP law firm.

#### **The Paulding Complaint**

A copy of the purported complaint was first posted by the Complainant, Supervisor Jimmy Paulding, on his Facebook social media page, a copy of which is attached as Attachment A.

The complaint contains a lot of extraneous (and erroneous) asserted but unproved claims about potential conflict of interests and contributions by developers that can fairly be considered campaign mudslinging. But the crux of the complaint is an allegation that the contributions by the contributor, particularly the one attributed to the “general” election, violated the law.

Here are the facts:

The contributor, Covelop, Inc.’s \$11,800 contributions to date to the Verdin campaign were allocated \$5,900 to the June 2026 primary election and \$5,900 for the November 2026 general election.

The Verdin campaign report clearly reflects this allocation of the two Covelop, Inc. contributions on pages 14 and 26 of its year-end 2025 campaign report filed with the County Clerk.

The contributions were fully lawful.

The gist of the Paulding complaint is that “per election” under state law means the whole 2026 election, whether that consists of both a primary and a general election.

This is wrong as a matter of law. When the county adopted this state contribution limit scheme in 2023, it adopted the state law *as is, as set forth in AB 571 (2021)*. The county **did not modify** either the per election rule or create an entirely new law that would have created an overall aggregate \$5,900 limit for a county supervisorial race (including a possible general election) for 2026.

#### Applicable Law

California Gov. Code §85301, subd. (d) which specifies the contribution limits from a “person” to an applicable local candidate are “per election.”

“Primary” and “general” elections are considered *separate* elections under Calif. Gov. Code 85318(a), a long-standing state law mandate required by the federal courts. See, e.g., *Service Employees International Union, et al. v. Fair Political Practices Commission* 721 F.Supp. 1172 (1989) 955 F.2d 1312 (1990), cert. den. 112 S.Ct. 3056 (1992) (Referred to hereinafter collectively as SEIU).

This Political Reform Act’s “per election” campaign limitations scheme is applicable to all state offices from Governor and constitutional officers to members of the California Legislature (Senate and Assembly), to members of the State Board of Equalization, and to local candidates governed by the provisions of AB 571 (2021).

Cal.Gov. Code § 85301(d) (1) provides, “A person shall not make to a candidate for elective county or city office, and a candidate for elective county or city office shall not accept from a person, a contribution totaling more than the amount set forth in subdivision (a) *per election*, as that amount is adjusted by the Commission pursuant to Section 83124.”

For the 2026 elections, a local candidate may raise up to \$5,900 for the primary election and another \$5,900 to the general election.

\$5,900 is the current state legislative candidate contribution limit as of 2021, adjusted by a cost-of-living adjustment in Calif. Gov. Code §83124 for 2026 elections.

General election contributions may be raised before the general election. A candidate may raise, but not use, funds designated for the general election in the primary election.

Importantly, Adam Verdin understands that the Covelop, Inc. contribution for the “general” election may not be used for the primary election and further understands that Gov. Code § 85318(d) and FPPC regulations prescribe in what circumstances (e.g., election decided without requirement to hold a “general” election) and how such contributions must be dealt with.

### **County Ordinance 3487**

On March 23, 2023, the San Luis Obispo County Board of Supervisors adopted Ordinance 3487, that repealed and rescinded a previous county campaign contribution Ordinance (No. 3429) adopted in 2020. Article I of Ordinance 3487 stated its purpose and intent was “to default to the State’s campaign contribution **limits and rules** per AB 571, including the manner in which such rules are enforced.”

The State contribution limit reflects both the amount (\$5,500, adjusted per inflation as provided in Gov. Code § 85301(d)) and the “per election” rules as specifically stated in that section and in Gov. Code § 85318, as previously described above. The Complainant was part of the 3-2 majority adopting the Ordinance. The County Counsel’s Memorandum in support of Ordinance 3487 (Attachment C hereto) refers to FPPC regulation 2 Cal.Code Regs. § 18545(a)(9), the basis for the cost-of-living adjusted 2026 \$5,900.<sup>1</sup>

Supervisor Paulding must not have read the Verdin campaign report, or willfully or negligently failed to understand the very state campaign law the county adopted in its own county ordinance 3487, that adopted the state law in 2023.

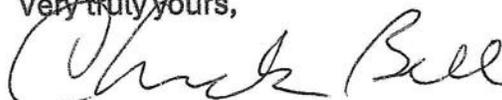
---

<sup>1</sup> That regulation applies to “an election” occurring during the annual COLA period. “An election” during that period may include both the “primary” election and the “general” election if one is required.

### **The Complaint Should Be Dismissed Immediately**

The Complaint is meritless. It has been alleged that the filing of the complaint was part of a smear campaign. Whether or not, clearly its filing alone in such circumstances (wrong on the law; no relevant facts to support the complaint; filed to cast an unwarranted shadow on his opponent) demand that it should be promptly dismissed on legal and evidentiary grounds. Supervisor Paulding is a licensed attorney, with special responsibilities to understand and follow – and not misrepresent – a law he promoted, voted for, purports to understand, and cites as an example of good government.

Very truly yours,



Chuck Bell

[\(charles.h.bell.jr@gmail.com\)](mailto:charles.h.bell.jr@gmail.com)

916-215-7757

CC: David Bainbridge, Chief, Enforcement Division

Dan Dow, District Attorney, County of San Luis Obispo

With Attachments A, B and C



February 15, 2026

Letter to the Fair Political Practices Commission  
Cc: San Luis Obispo County District Attorney's Office

To the Fair Political Practices Commission and District Attorney Dow,

I respectfully request a review and investigation into what appears to be a serious violation of San Luis Obispo County campaign finance law by Board of Supervisors candidate Adam Verdin, and the broader implications of developer influence in his campaign.

Public disclosures show Mr. Verdin has raised approximately \$165,000 in the Fourth District race, including more than \$30,000 from developers. Among those contributions is \$11,800 from Covelop, Inc., more than double the county's \$5,900 per-donor, per-election limit. This contribution appears on a campaign statement Mr. Verdin signed on January 29, 2026, certifying under penalty of perjury that the filing was "true and complete."

Beyond the apparent excess contribution, reporting indicates Mr. Verdin accepted maximum or near-maximum donations from multiple development-linked donors with active interests in county land use decisions. He was also a vocal supporter of the Dana Reserve project prior to its 3-2 approval, a project whose developer both contributed to his campaign and previously employed him. These facts raise serious concerns about undue influence in a district facing consequential housing, land use, and infrastructure decisions.

When questioned about the significant developer donations, Mr. Verdin's campaign stated:  
"It would be like if you're in a health care crisis and you refuse to take a donation from a doctor."

This response dismisses legitimate ethical concerns and appears to embrace the very special-interest influence that contribution limits and pay-to-play laws are designed to prevent. California law requires recusal from decisions involving contributors of more than \$250 unless the contribution is returned, precisely to avoid even the appearance of impropriety.

Page 1 of 2  
Jimmy Paulding for Supervisor 2026. FPPC # 1476420

ATT "A"

This photo is from a post.

View post



Supervisor Jimmy Paulding  
23h · 🌐



Like

Comment

Share



No comments yet  
Be the first to comment.



Comment as Charles H Bell Jr





Government Code § 91000 authorizes civil penalties and misdemeanor prosecution where violations are committed knowingly or willfully. Here, the evidence appears clear: a contribution more than twice the legal limit, disclosed and certified under penalty of perjury, with no public indication that the excess was cured.

Consistent and impartial enforcement of campaign finance laws is essential to maintaining public trust. I respectfully request that the Fair Political Practices Commission investigate whether Mr. Verdin's campaign knowingly violated contribution limits and pay-to-play requirements, and that the District Attorney evaluate whether enforcement action under state law is warranted.

Respectfully,

Jimmy Paulding  
 County Supervisor, District 4  
 Candidate for Re-Election June 2026  
 San Luis Obispo County

This photo is from a post.

[View post](#)

**Supervisor Jimmy Paulding**  
 23h ·



1

Like

Comment

Share



No comments yet

Comment as Charles H Bell Jr



ATT. "B"

**ORDINANCE NO. 3487**

**SAN LUIS OBISPO COUNTY ORDINANCE RESCINDING LOCAL CAMPAIGN FINANCE CONTRIBUTION LIMITS**

**WHEREAS**, the California Political Reform Act of 1974 (Gov. Code § 81000 et seq.) ("Political Reform Act") was amended by the voters in 1988, to impose contribution limitations for statewide offices, and authorized local jurisdictions to enact contribution limits or other prohibitions; and

**WHEREAS**, in 2019, the Legislature approved, and the Governor signed into law AB 571 which amended the Political Reform Act to impose contribution limitations on local elective offices in jurisdictions that have not enacted their own contribution limits; and

**WHEREAS**, on November 20, 2020, the County Board of Supervisors adopted Ordinance No. 3429 establishing local campaign contribution limits and local enforcement provisions; and

**WHEREAS**, by this Ordinance, the County Board of Supervisors desires to rescind Ordinance No. 3429 and to default to the State's campaign contribution limits and rules per AB 571.

The Board of Supervisors of the County of San Luis Obispo ordains as follows:

SECTION I. It is the purpose and intent of the Board of Supervisors in adopting this Ordinance to rescind Ordinance No. 3429 and to default to the State's campaign contribution limits and rules per AB 571, including the manner in which such rules are enforced.

SECTION II: Chapter 30.02 is hereby deleted from the San Luis Obispo County Code.

SECTION III: If any section, subsection, clause, phrase or portion of this ordinance is for any reason held to be invalid or unconstitutional by the decision of a court of competent jurisdiction, such decision shall not affect the validity or constitutionality of the remaining portion of this ordinance. The Board of Supervisors hereby declares that it would have passed this ordinance and each section, subsection, clause, phrase or portion thereof irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases or portions be declared invalid or unconstitutional.

SECTION IV: This ordinance shall take effect and be in full force and effect thirty (30) days after its passage and before the expiration of fifteen (15) days after passage of this ordinance, it shall be published once with the names of the members of the Board of Supervisors voting for and against the ordinance in a newspaper of general circulation published in the County of San Luis Obispo, State of California.

SECTION V: Adoption of this ordinance is not subject to environmental review under the California Environmental Quality Act because it is not a project as defined in CEQA Guidelines section 15378.

SECTION VI: In accordance with Government Code Section 25131, after reading the title of this Ordinance, further reading of the Ordinance in full is waived.

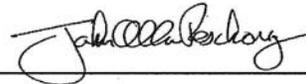
**INTRODUCED** at a regular meeting of the Board of Supervisors held on the 21st day of March, 2023 and PASSED and ADOPTED by the Board of Supervisors of the County of San Luis Obispo, State of California, on the 4th day of April, 2023, by the following roll call to vote, to wit:

AYES: Supervisors Bruce S. Gibson, Jimmy Paulding and Dawn Ortiz-Legg

NOES: Supervisor Debbie Arnold and Chairperson John Peschong

ABSENT: None

ABSTAINING: None



---

John Peschong  
Chairperson of the Board of Supervisors  
of the County of San Luis Obispo  
State of California

ATTEST:

WADE HORTON  
Ex-Officio Clerk of the Board of Supervisors

By: Niki Martin  
Deputy Clerk



**COUNTY OF SAN LUIS OBISPO  
BOARD OF SUPERVISORS  
AGENDA ITEM TRANSMITTAL**

(1) DEPARTMENT County Counsel		(2) MEETING DATE March 21, 2023		(3) CONTACT/PHONE Jon Ansolabehere/ 805-781-5400	
(4) SUBJECT Introduction of an Ordinance Rescinding Local Campaign Finance Contribution Limits. Hearing date set for April 4, 2023. All Districts.					
(5) RECOMMENDED ACTION  It is recommended that the Board: <ul style="list-style-type: none"> <li>1. Introduce an Ordinance rescinding Ordinance 3429 regarding local campaign finance contributions;</li> <li>2. Direct the Clerk to set for public hearing and action on April 4, 2023; and</li> <li>3. Authorize the preparation of a summary of the proposed ordinance and instruct the Clerk of the Board to publish the summary in a newspaper of general circulation and post the full text in the clerk's office at least 5 days prior to April 6, 2023, and within 15 days after adoption of the ordinance.</li> </ul>					
(6) FUNDING SOURCE(S) N/A		(7) CURRENT YEAR FINANCIAL IMPACT 0.00		(8) ANNUAL FINANCIAL IMPACT 0.00	
(9) BUDGETED? No					
(10) AGENDA PLACEMENT <input checked="" type="checkbox"/> Consent <input type="checkbox"/> Presentation <input type="checkbox"/> Hearing (Time Est. _____) <input type="checkbox"/> Board Business (Time Est. _____)					
(11) EXECUTED DOCUMENTS <input type="checkbox"/> Resolutions <input type="checkbox"/> Contracts <input checked="" type="checkbox"/> Ordinances <input type="checkbox"/> N/A					
(12) OUTLINE AGREEMENT REQUISITION NUMBER (OAR) N/A				(13) BUDGET ADJUSTMENT REQUIRED? BAR ID Number: <input type="checkbox"/> 4/5th's Vote Required <input type="checkbox"/> N/A	
(14) LOCATION MAP N/A		(15) BUSINESS IMPACT STATEMENT? No		(16) AGENDA ITEM HISTORY <input type="checkbox"/> N/A Date <u>January 24, 2023</u>	
(17) ADMINISTRATIVE OFFICE REVIEW Sarah Hayter					
(18) SUPERVISOR DISTRICT(S) All Districts					



## COUNTY OF SAN LUIS OBISPO

TO: Board of Supervisors

FROM: County Counsel / Jon Ansolabehere/ 805-781-5400

DATE: March 21, 2023

SUBJECT: Introduction of an Ordinance Rescinding Local Campaign Finance Contribution Limits. Hearing date set for April 4, 2023. All Districts.

### **RECOMMENDATION**

It is recommended that the Board:

1. Introduce an Ordinance rescinding Ordinance 3429 regarding local campaign finance contributions;
2. Direct the Clerk to set for public hearing and action on April 4, 2023; and
3. Authorize the preparation of a summary of the proposed ordinance and instruct the Clerk of the Board to publish the summary in a newspaper of general circulation and post the full text in the clerk's office at least 5 days prior to April 4, 2023, and within 15 days after adoption of the ordinance.

### **DISCUSSION**

The California Political Reform Act of 1974 (Gov. Code § 81000 et seq.) ("Political Reform Act") was amended by the voters in 1988, to impose contribution limitations for statewide offices, and authorized local jurisdictions to enact contribution limits or other prohibitions. In 2019, the Legislature approved, and the Governor signed into law AB 571 which amended the Political Reform Act to impose contribution limitations on local elective offices in jurisdictions that have not enacted their own contribution limits.

On November 20, 2020, the County Board of Supervisors adopted Ordinance No. 3429 establishing local campaign contribution limits and local enforcement provisions. This Ordinance set a campaign contribution limit of \$25,000 per person and vested enforcement authority with the District Attorney. On January 24, 2023, the Board directed staff to return to the Board to rescind Ordinance No. 3429 and to default to the State's campaign contribution limits and rules per AB 571. Per the State's rules, the current campaign limit for the period of January 1, 2023, through December 31, 2024, is \$5,500 per person. See 2 CCR § 18545(a)(9) for additional information. The attached Ordinance deletes Chapter 30.02 of the County's Code which was enacted per Ordinance 3429 thus defaulting to the State's campaign contribution limits and rules per AB 751.

### **OTHER AGENCY INVOLVEMENT**

County Counsel and the Clerk Recorder's Office have been involved in the development of this report and draft Ordinance.

**FINANCIAL CONSIDERATIONS**

If the Board decides to introduce and ultimately adopt this Ordinance rescinding Ordinance No. 3429, the County will no longer be responsible for the administration and enforcement of the campaign contribution limits. Rather, such administration will revert back to the Fair Political Practices Commission.

**RESULTS**

If adopted, the County will default to, and be in compliance with the State’s campaign contribution limits and governed per AB 571.

**ATTACHMENTS**

- 1 Draft Ordinance