

COMPLAINT RECEIVED

The Enforcement Division of the Fair Political Practices Commission received the enclosed complaint, COM-02272023-00509, on 2/27/2023 8:31:00 AM. The information filed in the complaint is below and any attachments filed will be included.

The following individuals are the named parties in this complaint:

Kenneth Enney
Complainant

Curt Dubost
Respondent

Carey Alvord-Schof
Respondent

James Brescia
Respondent

Kenneth Enney
Witness

Frank Triggs
Witness

Dorian Baker
Witness

The Violations alleged are:

Improper Use of Campaign Funds

Jurisdictions and Organizations/Entities: County of San Luis Obispo (Brescia) and Paso Robles Joint Unified School District

Respondent County of San Luis Obispo Department of Education unlawfully expended public funds of \$100 or more, without disclosure under Chapter 4 of the California Political Reform Act, Gov. Code sections 94001 et seq., to pay the salary and compensation of Respondent James Brescia in counseling, aiding, assisting and preparing a citizen petition under California Education Code sections 5091 et seq. to remove Complainant Kenneth Enney, an appointed member of the Board of Trustees of the Paso Robles Joint Unified School District, which compensation was a non-monetary expenditure under Gov. Code 82015 reportable to the proponent/campaign committee in support of candidate Carey Alvord during the period from October 10, 2022 and continuing to the date of this complaint.

Respondent Paso Robles Joint Unified School District unlawfully expended public funds. Respondent County of San Luis Obispo Department of Education unlawfully expended public funds of \$100 or more, without disclosure under Chapter 4 of the California Political Reform Act, Gov. Code sections 94001 et seq, to pay the salaries and compensation of Respondents Curt DuBost and Carey Alvord in counseling, aiding, assisting and preparing a citizen election petition under California Education Code sections 5091 et seq. to remove an appointed member of the Paso Robles Joint Unified School District between October 10, 2022 and continuing to the date of this complaint. Specifically, DuBost aided the rapid qualification of the petition and has conducted an ongoing effort using district resources attempting to suppress Complainant Kenneth Enney's use of campaign materials containing a public logo of the school district to whose Board of Trustees Enney is seeking election at an election set for April 18, 2023, including threats to cease and desist using such logo and of litigation against Complainant in the event he fails to accede to DuBost's demands, and Respondent Alvord used public resources including her employer's email communications address, server, and links, to develop, produce, organize the circulation of and qualification of a petition under California Education Code 5091 for an election to be held on April 18, 2023 for voters in the Paso Robles Joint Unified School District.