



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax (916) 322-0886

January 16, 2014

Palo Altans To Preserve Neighborhood Zoning
Timothy Gray, Treasurer

REDACTED

Re: Warning Letter

FPPC No. 13/1323: Palo Altans To Preserve Neighborhood Zoning; and

Timothy Gray, Treasurer

Dear Mr. Gray:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act"),¹ found in Government Code section 81000, et seq. This letter is in response to a referral from your filing officer that alleged you violated the Act's campaign disclosure provisions. We are closing this matter with a warning letter.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you failed to provide the occupation and employer information for contributions received of \$100 or more on the campaign statements covering the periods July 26, 2013 through September 21, 2013, and September 22, 2013 through October 21, 2013.

When a contribution of one hundred dollars (\$100) or more is received in the aggregate, from a single source during the reporting period covered by the campaign statement, the Act requires the contribution to be itemized by disclosing the contributor's full name, street address, occupation, or name of business if self-employed. (Gov. Code § 84211(f)(1)-(6).)

Your actions violated the Act because you failed to provide this information, even after requests from your filing officer for amendments. However, because you had the required documentation in your records, you immediately filed the amendments after contact from the Enforcement Division, and you do not have an enforcement history, we are closing this matter with a warning letter.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an FPPC case resolution without administrative prosecution or fine. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Fair Political Practices Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the FPPC's website ten (10) days from the date of this letter.

The FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Please feel free to contact Teri Rindahl at 916.327.2018 with any questions you may have regarding this letter.

Sincerely,

REDACTED

Gary S. Winuk
Chief, Enforcement Division

GSW/tr

cc: City Clerk, City of Palo Alto