



FAIR POLITICAL PRACTICES COMMISSION

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January 14, 2010

Beverly Palmer
Treasurer
Valley Democrats for Change

REDACTED

Mary Ellen Padilla
Treasurer
Bob Blumenfield for Assembly

REDACTED

Honorable Robert Blumenfield
State Capitol

REDACTED

Re: FPPC No. 08/327; Valley Democrats for Change, Bob Blumenfield for Assembly, and Robert Blumenfield.

Dear Ms. Palmer, Ms. Padilla, and Assemblymember Blumenfield:

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. As you may be aware, the FPPC received a complaint alleging the Valley Democrats for Change, a recipient committee that made independent expenditures in support of Bob Blumenfield for Assembly, coordinated with Robert Blumenfield and the Bob Blumenfield for Assembly committee when making those expenditures. Specifically, the complaint alleged that Valley

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 18109 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.

Democrats for Change and Bob Blumenfield for Assembly violated Section 85301(a), the Act's contribution limits.

The FPPC has completed its investigation of the complaint filed against Valley Democrats for Change and Bob Blumenfield for Assembly in the above-referenced matter. Our investigation has determined that there is insufficient evidence to determine that either committee committed a violation of the Act with respect to the above mentioned violation. Though it may have appeared that there was coordination between the two entities because family members and others close to Robert Blumenfield were involved in the Valley Democrats for Change committee, there is insufficient evidence of coordination between the committees. As a result of this finding of insufficient evidence that Valley Democrats for Change and Bob Blumenfield for Assembly's activity rose to the level of a violation of the Act, we are closing this case without taking any further action.

If you have any questions regarding this matter, please feel free to contact me at (916) 322-5660.

Sincerely,

REDACTED ✓

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Sukhi K. Brar
Commission Counsel
Enforcement Division