



FAIR POLITICAL PRACTICES COMMISSION

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January 29, 2013

Paul Gumina, Esq.
o/b/o Sheena Chang
o/b/o Vantec Thermal Technologies, Inc.

REDACTED

**RE: Advisory Letter: In the Matter of Vantec Thermal Technologies, Inc., FPPC
No. 11/474**

Dear Mr. Gumina:

The Fair Political Practices Commission (Commission) enforces the provisions of the Political Reform Act (the Act)¹ found in Government Code section 81000, and following. As you are aware, the Commission initiated an investigation regarding political money laundering involving your clients, Sheena Chang and Vantec Thermal Technologies, Inc., in connection with political contributions made in the 2008 Fremont election. After an investigation, the Commission has determined there is insufficient evidence to find a violation in this matter. Therefore, the Commission has closed our file in this matter.

Please be advised, Section 81002, subdivision (a) provides that "receipts and expenditures in election campaigns shall be fully and truthfully disclosed in order that the voters may be fully informed and improper practices may be inhibited." Timely and truthful disclosure of the source of campaign contributions is an essential part of the Act's mandate. In order to obtain disclosure of the true source of campaign contributions, Section 84301 provides that "no contribution shall be made, directly or indirectly, by any person in a name other than the name by which such person is identified for legal purposes."

Your client's failure to comply with the provisions of the Act in the future may result in an enforcement action against them, including monetary penalties of up to \$5,000 for each violation.

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.

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

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Bridgette Castillo
Commission Counsel
Enforcement Division