



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

March 1, 2010

✓ The Honorable Judy Hersher
Mr. Brian Hildreth
Bell, McAndrews and Hiltachk

REDACTED

Re: FPPC No. 09/224, Kevin Culhane, Judy Hersher.

Dear Judge Hersher and Mr. Hildreth:

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 an investigation begun against you by the FPPC in response to a voluminous complaint that alleged you violated the prohibition against making a campaign contribution in a State building, and the campaign reporting requirements of the Act.

The FPPC has completed its investigation of the facts in this case. **Specifically, the FPPC found no violation of the Act. Your awarding of attorneys fees in a case over which you presided in no way constitutes a campaign contribution.** We are therefore closing the case with no further action.

The Commission publishes forms and manuals to facilitate compliance with the provisions of the Act and provides guidance regarding filing obligations over the telephone and

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.

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through written advice. Please call the Commission's Technical Assistance Division at 1-866-275-3772 or visit our website at www.fppe.ca.gov.

Please feel free to contact me with any questions you may have regarding this letter.

Sincerely,

REDACTED

 GARY S. WINUK
Chief, Enforcement Division