



FAIR POLITICAL PRACTICES COMMISSION

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

February 18, 2015

TW Telecom
c/o Mr. Wayne Ordos
Law Offices of Wayne Ordos

Warning Letter Re: FPPC Case No. 14/1091, TW Telecom of California LP

Dear Mr. Ordos:

The Fair Political Practices Commission (FPPC) enforces the provisions of the Political Reform Act (the "Act") contained in Government Code sections 81000 through 91014. This letter is in response to a referral from the California Secretary of State. The FPPC's Enforcement Division (the "Division") has completed its investigation and found that your client, TW Telecom failed to timely file a "Report of Lobbyist Employer" (Form 635) for the following quarters:

- January 1, 2014 through March 31, 2014 (due April 30, 2014)
- April 1, 2014 through June 30, 2014 (due July 31, 2014)

Under sections 86115 and 86116, lobbyist employers are required to file quarterly reports disclosing payments made and expenses incurred in connection with lobbying activities. This requirement is satisfied by filing the Form 635.

Your actions violated the Act because you failed to file the aforementioned report(s) by the specified deadlines. However, since you do not have a history of violating the Act, because TW Telecom was acquired by another company during this period which led to confusion about the filing obligation and because you filed these forms before the Division initiated contact, we are closing your case with this warning letter. Although the Division is closing this case without seeking a penalty, you are still required to file all outstanding reports. Please note that any future non-filings will be brought to our attention and may result in monetary penalties. This warning letter may be considered should a future FPPC enforcement action become necessary.

A warning letter is an FPPC case resolution without administrative prosecution; however, this resolution does not provide you with the opportunity for a probable cause or administrative hearing. 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 days from the date of this

letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of your case. If we do not receive such notification, this warning letter will be posted on the FPPC's website.

Should you have questions regarding this letter, please contact Tracey Frazier at (916) 322-7050. Or, for further information regarding filing, contact Gloria Gilmore at (916) 653-0279.

Sincerely,

A large black rectangular redaction box covering the signature area.

Gary S. Winuk
Chief, Enforcement Division

cc: California Secretary of State, Political Reform Division

GSW:tf: