



FAIR POLITICAL PRACTICES COMMISSION

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

(916) 322-5660 • Fax (916) 322-0886

June 2, 2014

Andreas C. Rockas
Law Office of Andreas C. Rockas
o/b/o Jeffrey M. Worthe

REDACTED

RE: Warning Letter Re: FPPC Case No. 14/414; In the Matter of Jeffrey M. Worthe and The Worthe Real Estate Group, Inc.

Dear Mr. Rockas:

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 case opened as a result of your client Jeffrey M. Worthe and The Worthe Real Estate Group, Inc., "self-reporting" to our office contributions made in 2013 that were not timely disclosed in a required major donor report.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that contributions from your client in 2013 to Bloom for Assembly 2014 and Brown for Governor 2014 qualified your client as a major donor committee in the second half of 2013. On April 30, 2014, your client filed a major donor report disclosing these contributions.

The Act requires that contributions made by major donor committees be disclosed in campaign reports commonly referred to as "major donor reports." Specifically, Section 82013(c) defines a major donor as any person who "makes contributions totaling \$10,000 or more in a calendar year to or at the behest of candidates or committees." Once formed, major donor committees are required to file campaign reports reflecting their contributions made in a calendar year. Major donors that qualify, as your client did, in the last half of a calendar year, file a report disclosing all contributions made in that calendar year no later than January 31st of the following year.

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.

(Section 84200.) Your client's actions violated the Act because after contributing \$58,500 in 2013, he failed to file a major donor report by the January 31, 2014, deadline. However, because your client himself initiated this case and filed the report prior to the June 2014 election in which the recipients of his 2013 contributions are on the ballot, we have decided to close the case.

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. Although the FPPC is not seeking a penalty in the current matter, you will be responsible for any late filing fees assessed by your filing officer. (Section 91013.)

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. Although the FPPC is not seeking a penalty in the current matter, you are still responsible for any late filing fees assessed by your filing officer. (Section 91013.) 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 or visit our website at www.fppc.ca.gov.

Please feel free to contact Adrienne Korchmaros at (916) 322-8241 with any questions you may have regarding this letter.

Sincerely

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Gary S. Winuk
Chief, Enforcement Division

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