FAIR POLITICAL PRACTICES COMMISSION
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July 22, 2013

Kern County Democratic Central Committee and
Del Norte County Democratic Central Committee
C/O Lance Olson
Olson, Hagel & Fishburn LLP

REDACTED

Case Closure Letter Re: FPPC No. 10/931

To Whom it May Concern:

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. The FPPC initiated an investigation to determine whether the Kern County Democratic Central Committee ("Kern Central Committee") and the Del Norte County Democratic Central Committee ("Del Norte Central Committee") acted as intermediaries for the SEIU Local 1,000 in making contributions to Richard Pan's campaign for State Assembly in October of 2010 without disclosing the true source of the contributions in violation of Section 84302.

We have completed our investigation of the facts in this case. We did not find sufficient evidence that the contributions made by the SEIU Local 1,000 to the Kern Central Committee and Del Norte Central Committee were earmarked by the SEIU Local 1,000 as contributions that the central committees were to contributed to Richard Pan. That being the case, the evidence is insufficient to prove that Kern Central Committee and Del Norte Central Committee were acting as undisclosed intermediaries in violation Section 84302 when they made the contributions to Richard Pan's campaign.

[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.

Since we have determined that there is insufficient evidence that the parties violated the Act, we are closing this matter. Information from this case will be retained and may be considered in the event of an enforcement action based on future conduct or newly discovered information. Failure to comply with the provisions of the Act can result in an enforcement action with a penalty of up to $5,000 per violation.

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

Sincerely,

REDACTED

Dave Bainbridge
Senior Commission Counsel
Enforcement Division