



FAIR POLITICAL PRACTICES COMMISSION

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

(916) 322-5660 • Fax (916) 322-0886

July 23, 2013

Judith L. Larson
Larson & Associates

REDACTED

Warning Letter: Case No. 13/502; Judith L. Larson: Larson & Associates

Dear Ms. Larson:

The Fair Political Practices Commission (FPPC) enforces the provisions of the Political Reform Act (Act)¹. This letter is in response to a non-filer enforcement referral from the Secretary of State. The FPPC has completed its investigation and found that you failed to timely file your Report of Lobbying Firm Forms (Form 625²) for July 1, 2012 – September 30, 2012 (due October 31, 2012) and October 1, 2012 – December 31, 2012 (due January 31, 2013). Further, you completely failed to file your Lobbying Report Forms (615³) for July 1, 2012 – September 30, 2012 (due October 31, 2012) and October 1, 2012 – December 31, 2012 (due January 31, 2013).

Section 86114 of the Act provides that lobbying firms must file periodic reports. Section 82038.5 of the Act defines a lobbying firm as "any business entity, including an individual contract lobbyist" that "receives or becomes entitled to receive any compensation, other than reimbursement for reasonable travel expenses, for the purpose of influencing legislative or administrative action on behalf of any other person, and any partner, owner, officer, or employee of the business entity is a lobbyist" or "any business entity, including an individual contract lobbyist" that "receives or becomes entitled to receive any compensation, other than reimbursement for reasonable travel expenses, to communicate directly with any elective state official, agency official, or legislative official for the purpose of influencing legislative or administrative action on the behalf of any other person, if a substantial or regular portion of the activities for which the business entity receives compensation is for the purpose of influencing legislative or administrative action." Section 86117(a) provides that these reports "shall be filed during the month following each calendar quarter." The above-mentioned reports are filed by submitting a completed Form 625 to the California Secretary of State.

Section 86113 of the Act provides that lobbyists must file periodic reports. Section 82039 of the Act defines a lobbyist any individual who receives two thousand dollars (\$2,000) or more in economic consideration in a calendar month, other than reimbursement for reasonable travel expenses, or whose principal duties as an employee are, to communicate directly or through his or

¹ The Act is contained in Government Code sections 81000 through 91014. The regulations of the FPPC are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations.

² Electronic link to Form 625: <http://www.fppc.ca.gov/Pdf/625.pdf>

³ Electronic link to Form 615: <http://www.fppc.ca.gov/Pdf/615.pdf>

her agents with any elective state official, agency official, or legislative official for the purpose of influencing legislative or administrative action. Section 86113 of the Act provides lobbyists must complete and verify a periodic report which contains: A report of all activity expenses by the lobbyist during the reporting period. A lobbyist shall provide the original of his or her periodic report to his or her lobbyist employer or lobbying firm within two weeks following the end of each calendar quarter.

Your actions violated the Act because you failed to file the abovementioned statements by the specified deadlines. However, since you do not have a history of violating the Act and because the amount of lobbying activity unreported was relatively minimal, we are closing your case with this warning letter. This information will be retained and may be considered should a future enforcement action become necessary.

Although the FPPC is closing its case at this time, you are still required to file all outstanding statements with the Secretary of State and continue filing until you officially terminate your committee. You will be responsible for any late filing fees assessed by your filing officer. (§ 91013.) If your committee is no longer active, you may want to terminate as well. Please note: any future failure to timely file your required statements will likely result in monetary penalties.

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 any questions regarding this letter, contact Tracey Frazier at (916) 327-2019.

Sincerely,

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Gary S. Winuk
Chief, Enforcement Division

cc: The Secretary of State