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

July 28, 2014

Democrats of Napa Valley Club
Joanne Gifford
[redacted]

**Re: Warning Letter**
**FPPC No. 14/033: Democrats of Napa Valley Club; and Joanne Gifford, Treasurer**

Dear Committee and Ms. Gifford:

The Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act ("Act") found in Government Code Section 81000, and following.[1] As you know, we received a complaint alleging that you and the Napa Valley Club committee violated the campaign reporting provisions of the Act when the committee failed to report sub-vendor information.

A review of the campaign statement for the period covering January 1, 2012 through June 30, 2012, revealed the treasurer was reimbursed for campaign literature and paraphilia expenditures without providing the name(s) of the vendor(s) who received the payments from the treasurer on behalf of the committee.

Section 84211(k)(6) provides for when an agent of a committee, such as the treasurer, makes payments on the committee's behalf. When an agent of the committee makes such expenditures, the name, address, amount paid, and a description of the payment for each vendor that is paid $500 or more must be disclosed.

Your actions violated the Act, because expenditures of $500 or more were made on the committee's behalf, without the recipients of the expenditures being disclosed on the committee's campaign statement pursuant to Section 84211(k)(6). However, because an amendment was immediately filed once the error was made known, and you do not have an enforcement history, we have decided to close this case with a warning letter.

This letter serves as a written warning. 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.

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[1] The Political Reform Act is contained is 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.

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.

The FPPC publishes forms and manuals to facilitate compliance with the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Toll-Free Advice Line at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov where you will find forms available to be completed interactively.

If you have questions regarding this matter, please contact Teri Rindahl at (916) 327-2018.

Sincerely,

Gary S. Winuk, Chief
Enforcement Division

GSW/tr