



FAIR POLITICAL PRACTICES COMMISSION

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

August 1, 2014

Mr. Alberto Luzarraga
Linklaters LLP

[REDACTED]
[REDACTED]

Warning Letter: Case No. 13/1188, Linklaters LLP

Dear Mr. Luzarraga:

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 non-filer enforcement referral from the California Secretary of State (SOS) which alleged the Act's lobbyist reporting provisions were violated when a "Lobbyist Report" (Form 615) was not filed for Jean-Philippe Brisson.

The FPPC has completed its investigation and found that Linklaters LLP, as a California lobbying firm, failed to *properly* file a "Report of Lobbying Firm" (Form 625) with SOS for the following quarter(s):

- October 1, 2012 through December 31, 2012 (due January 31, 2013).

Under section 86114, lobbying firms are required to file periodic reports disclosing payments made and received in connection with lobbying activities. This requirement is satisfied by filing the Form 625. The firm must attach to the Form 625 a Form 615 completed by each partner, owner, officer, or employee of the firm who qualifies as a lobbyist.

Your actions violated the Act because you failed to file a *complete* Form 625 for the aforementioned quarter(s) by not attaching a Form 615 for all of your lobbyists. However, since Mr. Brisson was terminated during the same period and you do not have a history of violating the Act we are closing your case with this warning letter.

Although the Enforcement Division is closing this case without seeking a penalty, 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 any questions regarding this letter, contact Chris Hoeft at (916) 322-7050.

Sincerely,



Gary S. Winuk
Chief, Enforcement Division

cc: Mr. Chris Reynolds, Chief
California Secretary of State
Political Reform Division

GSW:tf:ch