



FAIR POLITICAL PRACTICES COMMISSION

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

(916) 322-5660 • Fax (916) 322-0886

August 23, 2012

Mr. Craig A. Moyer
Manatt, Phelps & Phillips, LLP

REDACTED

RE: Warning Letter
FPPC No. 12/088, Craig A. Moyer

Dear Mr. Moyer:

The Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”) found in Government Code Section 81000, and following. As you may be aware, the Commission received the results of a Franchise Tax Board audit of your firm’s activities for the 2009 and 2010 calendar years. Specifically, the audit revealed that you made a \$1,000 contribution to the Kamala Harris for Attorney General 2010 committee on May 14, 2010, while registered to lobby all state agencies. The Commission has decided to close this case with this warning letter.

Under Section 85702 of the Act, a lobbyist may not make a contribution to an elected state officer or candidate for elected state office, if that lobbyist is registered to lobby the governmental agency for which the candidate is seeking election or the governmental agency of the elected state officer.

Your actions violated the Act because you made a political contribution to a candidate for state elected office while your firm was registered to lobby all state agencies. We determined that further enforcement action was not warranted since there was little public harm, no evidence you have lobbied Attorney General Harris, and have no prior enforcement history.

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.

You must immediately file an amendment to FPPC Form 615 Lobbyist Report, for the quarter ending June 30, 2010, disclosing the contribution.

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.

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

Sincerely,

REDACTED

Zachary W. Norton
Commission Counsel
Enforcement Division