FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329
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August 23, 2010

Kevin Sumida, Treasurer
Strengthening Our Lives Through Education, Community Action and Civic Participation,
a Coalition of Labor Organizations – Candidate PAC (1285612)

REDACTED

Warning Letter Re: FPPC Case No. 100595; Strengthening Our Lives Through Education

Dear Mr. Sumida:

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. This letter is in response to an audit report referred to us by the Franchise Tax Board. The audit covered the period January 1, 2006 through December 31, 2006. A copy of the audit report is enclosed for your information.

The audit found that the committee overstated independent expenditures on its late independent expenditure reports and that three required reports were not filed until after the election. It also found that occupation and employer information was not disclosed for one contributor.

Sections 84204 and 85500 require a committee to file reports on paper and online when it makes a late independent expenditure as defined in Section 82036.5. Section 84211 requires that occupation and employer information be disclosed for any contributor of $100 or more. Additionally, Section 85700 specifies that any contribution of $100 or more for which the candidate or committee does not have the information on file must be returned.

The findings in the audit report constitute violations of the Act. However, the dollar amount involved is not large in relation to the committee's overall activity. Therefore we have decided to close this case with a warning letter.

[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.

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.

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 FPPC. 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 Program Specialist William Marland with any questions you may have regarding this letter.

Sincerely,

REDACTED

Sue Straine
Chief Investigator
Enforcement Division

Enclosure