



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
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September 12, 2013

Quality of Life PAC

REDACTED

David Gould, Treasurer
Quality of Life PAC

REDACTED

Re: Warning Letter Re: FPPC No. 13/210; Quality of Life PAC; and David Gould, Treasurer

Dear Mr. Gould:

The Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act ("Act"),¹ found in Government Code section 81000, et seq. This letter is in response to a complaint filed against you by the Los Angeles County Registrar-Recorder that alleged you have failed to file your committee's semiannual campaign disclosure statement for the period ending December 31, 2012.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you failed to provide the Los Angeles County Registrar-Recorder with an original semiannual campaign disclosure statement for the period covering October 21, 2012 through December 31, 2012 by the January 31, 2013 deadline.

The Act provides that elected officers, candidates, and committees shall file semiannual statements. (Section 84200.) When a filing obligation is triggered, the Act requires candidates and committees to file with their local filing officer. For county general purpose committees, the filing officer is the elections official of the county in which they are domiciled. (Section 84215(c).) Furthermore, if a committee is required to file campaign statements required by Section 84200 or 84200.5 in places designated in subdivisions (a) to (d), it shall continue to file these statements in those places, in addition to any other places required by this title, until the end of the calendar year.

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.

On August 28, 2012, an amendment was filed that indicated the Quality of Life PAC was a county general purpose committee with filing obligations with the Los Angeles County Registrar-Recorder. On January 23, 2013, another amendment was filed that indicated the Quality of Life PAC was a city committee, and the campaign disclosure statement for the period ending December 31, 2012, was filed with the City of Cypress.

Your actions violated the Act because you failed to file the semiannual campaign statement for the period ending December 31, 2012, with the Los Angeles County Registrar-Recorder's office. You must provide an original filing of the campaign statement to the county filing officer. However, because the statement was timely filed with the City of Cypress, and the committee does not have an enforcement history, we have decided to close our file on this matter 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.

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.

You are obligated to continue filing campaign statements until you officially terminate your committee. If your committee is no longer active, you may want to terminate your committee at this time as well. Failure to do so is a violation of the Act. Please be advised that after every filing deadline, your local filing officer will refer all non-filers to the Enforcement Division. Any future failure to file your campaign statements will automatically be brought to our attention.

Although the FPPC is not seeking a penalty in the current matter, you are still responsible for any late filing fees assessed by your filing officer. (Section 91013.)

The FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Please feel free to contact Teri Rindahl at (916) 327-2018 with any questions you may have regarding this letter.

Sincerely

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Gary S. Wmuk
Chief, Enforcement Division