



FAIR POLITICAL PRACTICES COMMISSION

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

September 18, 2014

✓ Craig De Luz
Uncommon Sense

Warning Letter Re: FPPC Case No. 13/1386

Craig De Luz
Uncommon Sense

Dear Mr. De Luz:

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 you violated the Act's lobbying reporting provisions.

The FPPC has completed its investigation and found that you, as a registered lobbyist in California and the owner of Uncommon Sense, a California lobbying firm, failed to file a "Lobbyist Report" (Form 615) and a "Report of Lobbying Firm" (Form 625) with SOS for the following periods:

- April 1, 2013 through June 30, 2013 (due July 31, 2013);
- July 1, 2013 through September 30, 2013 (due October 31, 2013);
- October 1, 2013 through December 31, 2013 (due January 31, 2014);
- and January 1, 2014 through March 31, 2014 (due April 30, 2014).

Under sections 86113 through 86116, lobbyists, lobbying firms, and lobbying coalitions are all required to file periodic reports disclosing their lobbying activities by the time as specified in 86117 and in the format required under 86118.

Your actions violated the Act because you failed to file a Form 615 and 625 for the aforementioned periods. However, since you do not have a history of violating those provisions of the Act and you stated that there wasn't a significant amount of lobbying activity during the relevant period, 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 Robert Binning at (916) 323-2689.

Sincerely,



Gary S. Winuk
Chief, Enforcement Division

cc: Chris Reynolds
California Secretary of State
Political Reform Division

GSW:rb