



F A I R P O L I T I C A L P R A C T I C E S C O M M I S S I O N

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October 12, 2009

✓ Ms. Paula Deeter
Volunteers to Elect Paula Deeter
4th District Supervisor

REDACTED

Mr. Ralf Laguna
Volunteers to Elect Paula Deeter
4th District Supervisor

REDACTED

Warning Letter Re: FPPC No. 09/398, Paula Deeter; Volunteers to Elect Paula Deeter 4th District Supervisor; Ralf Laguna, Respondent(s)

Dear Ms. Deeter and Mr. Laguna:

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 a pro-active investigation by the FPPC regarding your failure to accurately complete campaign disclosure statements in connection with your June 3, 2008 election bid for Mendocino County Supervisor.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you failed to accurately itemize contributions received by, and expenditures made to, your committee.

The Act provides that candidates and committees must report specific information on campaign disclosure statements. Specifically the Act requires that, for cumulative contributions

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 18109 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.

of \$100 or more, the committee must report the full name of the contributor, the contributor's street address, occupation, the name of his or her employer, or if self-employed, the name of the business, the date and amount of each contribution and the cumulative amount of contributions. (Section 84211(f).) The Act also requires that, for expenditures of \$100 or more, the committee must report the full name of the person to whom the expenditure is made, his or her street address, the amount of the expenditure, a brief description of the expenditure, and if the payment is an expenditure to support or oppose a candidate or committee, the name, office, jurisdiction or measure. (Section 84211(k)(5).)

The campaign disclosure statements you filed in connection with the election lacked street addresses for contributors, failed to itemize expenditures and contained omissions on the summary page portion of the statement. At our request, you submitted amendments of the campaign statements to the Mendocino County Clerk. Those amendments have been reviewed and although you for the most part, complied with our request, the itemized expenditures still lacked street addresses.

Your actions violated the Act because you failed to itemize contributions and expenditures as required by Section 84211.

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.

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

Sincerely

REDACTED

 Gary S. Winuk
Chief, Enforcement Division

GSW/jt