



FAIR POLITICAL PRACTICES COMMISSION

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November 6, 2013

Mr. Joseph L. Barloon
Skadden, Arps, Slate, Meagher & Flom, LLP
o/b/o De La Rosa and Company
N.W.

REDACTED 111

RE: Closure Letter
FPPC No. 13/0079: De La Rosa and Company

Dear Mr. Barloon:

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 know, the Enforcement Division of the Commission made an inquiry into unreported gifts given to public officials by De La Rosa and Company (“De La Rosa”). According to the information gathered during this inquiry, the Commission has found no violation of the Act in this matter.

On April 30, 2012, the Enforcement Division requested from De La Rosa a spreadsheet of all gifts provided to public officials in jurisdictions where De La Rosa has done or attempted to do business during a certain time period. Section 87027, subdivision (a)(1), provides that gifts of \$50 or more in value must be reported as income. Review of the spreadsheets provided revealed evidence of gifts valued at over \$50 made to public officials, which the majority of the public officials identified had failed to correctly report. However, as a result of the information you provided, these public officials were contacted and have now correctly reported the gifts received. We appreciate your cooperation in resolving this matter, which is now closed.

Sincerely,

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Galena West
Commission Counsel IV
Enforcement Division

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