FAIR POLITICAL PRACTICES COMMISSION
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June 8, 2011

Michael R.W. Houston
o/b/o Thomas Fuentes

REDACTED

Case Closure Letter Re: FPPC No. 11/067, Thomas Fuentes

Dear Mr. Houston:

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. As you are aware, the FPPC received a complaint on January 31, 2011, alleging Mr. Fuentes violated of Sections 87209 and 87207 of the Act by not disclosing his alleged business position with and income from the Lang Financial Corporation ("LFC").

The Enforcement Division of the Commission has completed its investigation of the allegations. We found that Mr. Fuentes did not receive compensation from LFC while a member of the South Orange County Community College Board of Trustees ("SOCCCBOT"), and therefore was not required to report LFC as a source of income.

LFC donated the use of an office to the Claremont Institute, which the Claremont Institute allowed Mr. Fuentes to use in his capacity as a fellow at the Claremont Institute, and Mr. Fuentes properly reported the Claremont Institute as a source of income on his Statement of Economic Interests.

We also found that, under these facts, Mr. Fuentes was not a director, officer, partner, trustee, employee, or held a position of management, at LFC while a member of the SOCCCBOT. He was therefore not required to disclose LFC as a business position.

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[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.

Therefore Mr. Fuentes has not violated Section 87209 or 87207 of the Act, and we are closing this case without further action.

If you have any questions regarding this matter, please feel free to contact me at 916-327-6357.

Sincerely,

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Milad Dalju
Commission Counsel
Enforcement Division