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

July 25, 2011

Natalie G. Steinberg, Treasurer
The GLBT Alliance of Santa Cruz County No on 8
REDACTED

Warning Letter Re: FPPC No. 11/451; The GLBT Alliance of Santa Cruz County No on 8

Dear Ms. Steinberg:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act").[1] This letter is in response to an audit report referred to us by the Franchise Tax Board on May 31, 2011. The audit covered the period of January 1, 2008 through December 31, 2008.

The FPPC has completed its review of the facts in this case. Specifically, the FPPC found that The GLBT Alliance of Santa Cruz County No on 8 (the "Committee") violated the Act by failing to maintain records, such as copies of contributors' checks and duplicate deposit slips for contributions received totaling $23,542.

Section 84104 requires that detailed records be maintained for contributions received. Regulation 18401(a) requires that for contribution received of $25 or more, the treasurer maintains original source documentation, which includes copies of contributor checks, cashier's checks, money orders, wire transfers, deposit or duplicate deposit slips, and any other documents, reflecting all items deposited, and all deposits made, to any campaign account, in any bank or other financial institution.

The Committee violated the Act because it failed to maintain complete records for a total of $23,542 received in contributions. However, we are closing this matter with a warning letter

[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.

because the Committee did maintain bank statements and self-generated records containing contribution information in an attempt to comply with the record maintenance requirements.

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.

If you have further questions regarding this matter, please contact me at (916) 322-5796.

Sincerely,

REDACTED

Galena West
Senior Commission Counsel
Enforcement Division

GW/db