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

October 22, 2009

Iddo Benzeevi
Highland Fairview Operating Company

REDACTED

**Re: Warning Letter Re: FPPC No. 09/716; Highland Fairview Operating Company, and Iddo Benzeevi**

Dear Mr. Benzeevi:

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 complaint filed against you that alleged you failed to file periodic campaign disclosure statements as a Major Donor committee.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you and your committee failed to file a semi-annual campaign statement for the period of July 1, 2008 through December 31, 2008 by the February 2, 2009 deadline.

The Act requires that candidates and their committees file campaign statements at periodic intervals. Specifically the Act provides that committees pursuant to subdivision (b) or (c) of Section 82103 shall file semi-annual statements no later than July 31 for the period ending June 30 and no later than January 31 for the period ending December 31, if they have made contributions or independent expenditures during the six-month period before the closing dates of the statements. (Section 84200(b).)

Your actions violated the Act because you failed to file the semi-annual statement by the specified deadline. Throughout the year, you filed a number of major donor statements, Form 461, covering specific time periods. Most recently, on October 30, 2008, you filed a Form 461 for the period

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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 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.

ending October 27, 2008, in what appears to be a preelection statement. Under the Act, any contributions made after July 1, 2008 would be reported on a Form 461 covering the period of July 1, 2008 through December 31, 2008. However, this matter can be corrected by filing an amendment to your last statement filed. If you have not made any contributions after October 27, 2008, then an amendment is needed to reflect the correct period covered as July 1, 2008 through December 31, 2008. If additional contributions were made after the October 27th date, these contributions must be reflected on your amended Form 461.

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.

Although the FPPC is not seeking a penalty in the current matter, you are still responsible for any late filing fees assessed by your filing officer. (Section 91013.)

The FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Please feel free to contact Teri Rindahl at (916) 327-2018, with any questions you may have regarding this letter.

Sincerely,

REDACTED

Gary S. Winuk, Chief
Enforcement Division

GSW/tr