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

December 2, 2011

Mr. Sunil Vethody
Institute of Medical Education
REDACTED

Warning Letter Re: FPPC No. 11/1083, Institute of Medical Education, Sunil Vethody, Respondent(s)

Dear Mr. Vethody:

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 referral from the Secretary of State that alleged that you failed to a lobbyist employer report for the second quarter of 2011.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that your lobbyist, Sloat, Higgins, Jensen and Associates, terminated your lobbying relationship effective June 30, 2011. The last statement you filed was for the quarter January 1, 2011 through March 31, 2011. Since the relationship did not terminate until June 30, you failed to file a lobbyist employer quarterly report (Form 635) for the period April 1, 2011 through June 30, 2011.

The Act requires lobbyist employers to file quarterly statements during the month following each calendar quarter. (Section 86114.)

Your actions violated the Act because you failed to file your second quarter lobbyist employer report by the August 1, 2011 deadline. However, since your lobbying relationship ended on June 30, 2011, we are closing this matter.

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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.

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.

You are required to file your lobbyist employer report in electronic format with the Office of the Secretary of State for the period April 1, 2011 through June 30, 2011.

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
cc: Mr. Chris Reynolds
Office of the Secretary of State