



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

April 21, 2021

Beverly Grossman Palmer
Strumwasser & Woocher LLP
o/b/o Fatima Iqbal-Zubair
Via email: bpalmer@strumwooch.com

Warning Letter Re: FPPC No. 21/47, Fatima Iqbal-Zubair for Assembly 2020

Dear Ms. Grossman Palmer:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a complaint filed against your client, Fatima Iqbal-Zubair, that alleged she violated the Act’s Statement of Economic Interests (“SEI”) disclosure provisions by failing to timely report her spouse’s income on her Candidate SEI.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that your client, as a candidate for District 64 of the California State Assembly in the November 3, 2020 General Election, failed to timely disclose her spouse’s income on Schedule C of her Candidate SEI.

Under the Act, a candidate for an office specified in Government Code Section 87200, including a candidate for elective state office such as the State Legislature, is required to file a Candidate SEI disclosing his or her investments, business positions, interests in real property, and income received during the preceding 12 months.² The SEI must be filed no later than the deadline for the declaration of candidacy.³

Your client’s actions violated the Act because she failed to disclose her spouse’s income on her Candidate SEI. However, mitigating factors exist such that the Enforcement Division has decided to close your case with a warning letter rather than issue a fine. You indicated that as a first-time

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 87201.

³ *Ibid.*

candidate during the November 3, 2020 election, your client did not realize she was required to include her spouse's income on her Candidate SEI. Furthermore, she was an unsuccessful candidate, she timely filed both pre-election campaign statements, she has no prior violations of the Act, and after learning that her spouse's income was required to be disclosed, your client immediately filed an amendment to the applicable SEI.

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 Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. 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 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 Enforcement Division 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 Commission's website ten (10) days from the date of this letter.

If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact Amber Burnside at aburnside@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

AJB/ab