



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

February 9, 2023

Via email: [rebecca.olson@millerpoliticallylaw.com](mailto:rebecca.olson@millerpoliticallylaw.com)

Respondents Rick Bonilla, individually and o/b/o  
Rick Bonilla for City Council 2017  
Russell Miller  
c/o Rebecca Miller, Esq.  
Miller & Olson, LLP  
400 Capitol Mall, Suite 1545  
Sacramento, CA 95814-4434

**Warning Letter Re: FPPC No. 2021-00465; Rick Bonilla, Rick Bonilla for City Council  
2017, Russell Miller**

Dear Committee and Rick Bonilla:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").<sup>1</sup> As you are aware, the Enforcement Division received an anonymous complaint alleging that you violated the contribution aggregation provisions of the Act. The Enforcement Division has completed its review and found that you and the Committee failed to aggregate three contributions received.

Under the Act, contributions received from two or more persons must be "aggregated" under certain circumstances.<sup>2</sup> For example, if an individual makes a contribution to a committee and a business of which the individual is a majority owner also makes a contribution to the same committee, the individual's and the business entity's contributions must be aggregated when they are disclosed on the applicable campaign statement(s). When contributions are "aggregated," the contributors are treated as a single person for reporting purposes and for determining compliance with any contribution limits that might be in effect.

Your actions violated the Act because you failed to aggregate contributions received from Jamie D'Alessandro, Michael Field, and Windy Hill Property Ventures on your Form 460 covering the period of October 22, 2017 through December 31, 2017. However, the Enforcement Division has decided to close your case with this warning letter rather than a fine because the Committee received information indicating that all three contributors have different addresses; one or more contributors did not provide notification as required under Regulation 18428, subdivision (b)(2); the contributions were timely disclosed; and you each have no prior Enforcement history.

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014 and all statutory references are to this code.

<sup>2</sup> Sections 82015.5 and 84211; Regulation 18428.

Please note, 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 have any questions, please feel free to contact me by e-mail at [dcastro@fppc.ca.gov](mailto:dcastro@fppc.ca.gov) or by phone at (916) 322-5070.

Sincerely,

*David E. Castro*

David E. Castro, Commission Counsel  
Enforcement Division