



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

August 28, 2023

Amy Blumberg James
[REDACTED]

Warning Letter Re: FPPC No. 2023-00577; Amy Blumberg James

Dear Amy Blumberg James,

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 matter you self-reported to the Enforcement Division where you stated that you failed to timely file two lobbyist quarterly reports (Form 615).

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to timely file two lobbyist quarterly reports (Form 615) for the periods: October 1, 2022 through December 31, 2022 by the January 31, 2023 deadline and January 1, 2023 through March 31, 2023 by the April 30, 2023 deadline.

The Act requires all registered lobbyists to complete the applicable lobbyist quarterly report (Form 615) for each calendar quarter, regardless of the level of activity.² Lobbyists file their Form 615 as an attachment to either the report of lobbyist employer (Form 635) or lobbying firm (Form 625).³

Your actions violated the Act because you failed to timely file the required lobbyist quarterly reports (Form 615) by the January 31, 2023 and April 30, 2023 deadlines. However, you electronically filed the missing reports immediately and without Enforcement Division intervention, there was no reportable activity disclosed on the reports, and you have not had a prior violation of this section within the last five years. Therefore we are closing this matter with this warning letter rather than issuing a fine.

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

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 18104 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 86113.

³ Sections 86114(a)(4) and 86116(e)

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 Ginny Brown at (916) 322-8064 or gbrown@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

James M. Lindsay

James M. Lindsay, Chief
Enforcement Division

JML:gab