



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

May 24, 2019

Jennifer Lundmark  
197 Clarendon Street  
Boston, MA 02116  
Also sent via email: [jlundmark@jhancock.com](mailto:jlundmark@jhancock.com)

**Warning Letter Re: FPPC No. 2019-00046; Jennifer Lundmark**

Dear Ms. Lundmark:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> This letter is in response to a referral received from the Secretary of State’s Office that alleged you failed to timely file three quarterly lobbyists reports for your position with Hancock Capital Investment Management LLC. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to timely file three lobbyist quarterly reports (Form 615) during the 2017 – 2018 legislative session.

The Act requires all lobbyists to complete the Lobbyist Report (Form 615) for each calendar quarter, regardless of the level of activity.<sup>2</sup> If a lobbyist ceases all activity during the legislative session, the lobbyist must file a Notice of Termination (Form 606) within 20 days after ceasing lobbying activities.<sup>3</sup> Lobbyists who cease all lobbying activity at the end of a regular session of the Legislature, therefore, will not be required to renew their registration, need not file the Form 606 to terminate.

Your actions violated the Act because you failed to timely file three lobbyist quarterly reports for the sixth, seventh, and eighth calendar quarters of the 2017 – 2018 legislative session. However, since you filed the outstanding reports immediately after being contacted by the Enforcement Division, had no reportable activity during each of the filing periods, you are a placement agent, and you have no prior enforcement history, we are closing your case with this warning letter rather than issuing a fine.

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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. 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.

<sup>2</sup> § 86113.

<sup>3</sup> § 86107, subdivision (a).

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](http://www.fppc.ca.gov).

Please feel free to contact Chloe Hackert at (916) 322-8190 or [chackert@fppc.ca.gov](mailto:chackert@fppc.ca.gov) with any questions you may have regarding this letter.

Sincerely,



Galena West, Chief  
Enforcement Division

GW/ ch  
cc: Secretary of State's Office