



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

July 20, 2018

Raymond Loera for Imperial County Sheriff 2018  
Maria Birdsall, Treasurer

[REDACTED]  
[REDACTED]

Raymond Loera, Candidate

[REDACTED]  
[REDACTED]

Also sent to: [REDACTED]

**Warning Letter Re: FPPC No. 2018-00574, Raymond Loera for Imperial County Sheriff 2018; Raymond Loera; Maria Birdsall, Treasurer**

Dear Mr. Loera and Ms. Birdsall:

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 from the Imperial County Clerk's Office regarding your failure to timely file the pre-election campaign statement for the reporting period of January 1, 2018 through April 21, 2018.

The Enforcement Division has completed its investigation of the facts in this case. Specifically, we found that you failed to file the pre-election campaign statement for the reporting period of January 1, 2018 through April 21, 2018 by the April 26, 2018 deadline.

The Act requires candidate-controlled committees to file two pre-election campaign statements prior to the applicable election.<sup>2</sup> In addition, semi-annual campaign statements must be filed each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.<sup>3</sup> The obligation to file semi-annual campaign statements continues until the candidate or treasurer terminates the committee. Controlling candidates and committee treasurers are jointly and severally liable for violations by the committee.<sup>4</sup>

You violated the Act because you failed to file your first pre-election campaign statement (Form 460) with the Imperial County Clerk's Office by the April 26, 2018 deadline. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine because you filed the missing campaign statement immediately after being contacted by the

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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 84200.5 and 84200.8.

<sup>3</sup> Section 84200.

<sup>4</sup> Sections 83116.5 and 91006.

Enforcement Division, you ran for election unopposed, the activity for the reporting period was minimal, and you have no prior history of violating the Act.

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. This resolution does not provide you with the opportunity for a probable cause hearing or administrative hearing. 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 days from the date of this letter. Upon this notification, the Enforcement Division will rescind this warning letter and proceed with administrative prosecution of your case. If we do not receive such notification, this warning letter will be posted on the Commission's website.

If you have any questions, please feel free to contact Chris Holm at [cholm@fppc.ca.gov](mailto:cholm@fppc.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Galena West".

Galena West  
Enforcement Division Chief

GW:cah

cc: Josie Morales, Imperial County Registrar of Voters  
via email: [josiemorales@co.imperial.ca.us](mailto:josiemorales@co.imperial.ca.us)