



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

August 23, 2022

Community Futures LLC
Attn: Sharon Hall
[REDACTED]

Warning Letter Re: FPPC No. 2022-00618; Community Futures LLC

Dear Community Futures LLC:

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 sworn complaint alleging that you failed to timely file Major Donor Campaign Statements (Form 461) for contributions made in 2021 and 2022.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you qualified as a major donor committee in 2021 as a result of a contribution made in the amount of \$10,000 to Stop the Republican Recall of Governor Newsom. In addition, you qualified as a major donor committee in 2022 as a result of a contribution made in the amount of \$25,000 to Budget Priorities Committee in Support of Rabbitt for District 2 Supervisor 2022. You failed to file a Major Donor Campaign Statement (Form 461) for the reporting period of January 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, and failed to file Form 461 for the reporting period of January 1, 2022 through June 30, 2022 by the July 31, 2022 deadline.

Under the Act, an individual or entity that makes contributions totaling \$10,000 or more in a calendar year qualifies as a major donor committee and incurs filing obligations.² If the \$10,000 threshold is met in the first six months of the calendar year, a major donor committee must file Form 461 covering the period of January 1 through June 30 by July 31 of that calendar year. If additional contributions are made from July 1 through December 31, a major donor committee must file Form 461 covering the period of July 1 through December 31 by January 31 of the following calendar year.³ Depending on when the contributions are made and which candidates and/or committees the contributions are made to, a major donor committee may also be required to file 24-Hour Contribution Reports (Form 497) if it makes a contribution(s) totaling \$1,000 or more to a candidate or committee.⁴

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 82013(c).

³ Section 84200(b).

⁴ Sections 82036 and 84203.

You violated the Act by failing to timely file two semi-annual Major Donor Campaign Statements (Form 461). However, the Enforcement Division has decided to close this case with this warning letter rather than a fine for the following reasons: You timely disclosed both contributions on Form 497; you have since filed the Form 461s; the contribution amounts were relatively low; the recipients of the contributions timely disclosed the contributions; 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 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.

Please feel free to contact Tara Stock at tstock@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

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