December 15, 2021

Antonio Villaraigosa, individually and
o/b/o Villaraigosa for Governor 2018
[redacted]
Sent Via Email: voices@antonioforcalifornia.com

Rita Copeland, individually and
o/b/o Villaraigosa for Governor 2018
[redacted]
Sent Via Email: campaigns@rcbs.us

**RE: Warning Letter: FPPC No. 21/01091; In the Matter of Villaraigosa for Governor 2018; Antonio Villaraigosa and Rita Copeland**

Dear Antonio Villaraigosa, Rita Copeland and Villaraigosa for Governor 2018:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").[1] This case was opened in response to an audit performed by the Political Reform Audit Program of the Franchise Tax Board ("FTB") of Villaraigosa for Governor 2018 ("Committee"). The period covered by the audit was January 1, 2016 through June 30, 2018.

The FTB audit report concluded that the Committee substantially complied with the Act's disclosure and recordkeeping provisions, except that the Committee, Villaraigosa and Copeland violated the Act by accepting aggregated contributions that exceeded the contribution limits by $27,800.

One of the purposes of the Act is to minimize the potentially corrupting influence, and the appearance of corruption, caused by large campaign contributions.[2] For this reason, the Act includes campaign contribution limits.[3]

The Committee, Villaraigosa and Copeland's actions violated the Act because the Committee accepted aggregated contributions over the limit by $27,800. The Enforcement Division has determined that further enforcement action is not warranted because the Committee issued a refund check within 16 days of receipt of the over the limit contribution. Although this refund check was not

[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 18109 through 18997 of Title 2 of the California Code of Regulations.
[2] Section 81001, subd. (c).
[3] Section 85301 and Regulation 18545.

cashed, the Committee re-issued a refund check at a later date to return the over the limit contribution. Ultimately, the public harm was low as the over the limit contribution was returned prior to the June 5, 2018 Primary Election. Additionally, the Committee, Villaraigosa and Copeland do not have prior enforcement history for accepting over the limit contributions; the Committee has since terminated; and Villaraigosa was an unsuccessful candidate in the 2018 Primary Election.

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. But the warning letter resolution does not provide the Committee with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If the Committee wishes to avail itself of these proceedings by requesting that its 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 me at (916) 324-8787 or Bcastillo@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division

cc: Franchise Tax Board