



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

July 29, 2022

Julie Luckey
[REDACTED]

Warning Letter Re: FPPC No. 2022-00555; Julie Luckey

Dear Ms. Luckey:

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 your self-reported complaint wherein you acknowledged that you violated the campaign disclosure provisions of the Act.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you qualified as a major donor in 2021 by making contributions totaling \$39,233 (\$25,000 during the period covering January 1, 2021 through June 30, 2021, and \$14,233 during the period covering July 1, 2021 through December 31, 2021). You failed to file Major Donor Campaign Statements (Form 461) by the July 31, 2021 and January 31, 2022 deadlines.

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 if it makes a contribution(s) totaling \$1,000 or more to a candidate or committee.⁴

You violated the Act by failing to timely file two semi-annual Major Donor Campaign Statements. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine for the following reasons: You self-reported the violations; you have since filed the missing campaign statements; the contribution amounts were relatively low; the

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.

recipients of the contributions timely disclosed the contributions so there was minimal public harm; and you have no prior Enforcement history. Please note that while the Enforcement Division is closing this matter without a fine, your filing officer, the Secretary of State, may assess late filing penalties.

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 or (916) 322-8241 with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

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