



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

September 13, 2023

Valerie Turella
Davina Flemings
Via Email: jkaune@nmgovlaw.com

No Action Closure Letter Re: FPPC No. 2019-00144; Valerie Turella and Davina Flemings

Dear Valerie Turella and Davina Flemings:

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 commission-initiated complaint that alleged you received substantial bonuses contingent on the passage of SB901 in violation of Section 86205(f). After conducting our investigation and review of the case, the Enforcement Division confirmed there was insufficient evidence to determine the payments were contingent upon the defeat, enactment, or outcome of any proposed legislative or administrative action. Therefore, we are closing this matter without further action as there is insufficient evidence to support a finding that you violated the Act.

Should you have any questions regarding this letter, please feel free to contact me at 916-327-6358 or arose@fppc.ca.gov.

Sincerely,

Alex J Rose

Alex J. Rose,
Commission Counsel
Enforcement Division

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.