



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

September 29, 2023

Jack Dorsey
[REDACTED]

Warning Letter: FPPC No. 2022-00259 Jack Dorsey

Dear Jack Dorsey:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a Commission initiated investigation regarding the failure to file a major donor campaign statements.

The Enforcement Division has completed its review of this case. Specifically, we found that you qualified as a major donor in 2018 by making a contribution of \$75,000 on October 19, 2018, to the No Plan, No Accountability, No on Prop C committee. Additionally, the investigation found that you made a contribution of \$50,000 on October 23, 2018, to the same committee, totaling \$125,000 in 2018.

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

Your actions violated the Act by failing to file two 24-Hour Contribution Reports and a Major Donor Campaign Statement for 2018. However, the following mitigating factors are present: it appears you are a first-time major donor; the contributions were timely disclosed by the recipient committee, reducing the public harm; the age of the violations and you have since filed the required Major Donor Campaign Statements. Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which requires the Enforcement Division to take all appropriate actions within their discretion to decrease the Division’s annual carryover caseload, the Enforcement Division is closing this case

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 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 82013, subd. (c).

³ Section 84200, subd. (b).

⁴ Sections 82036 and 84203.

with this warning letter.⁵ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁶ This resolution may not be used as a comparable case for other enforcement matters.⁷

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.

If you have any questions regarding this letter, please contact me at (916) 324-8787 or Bcastillo@fppc.ca.gov.

Sincerely,

Bridgette Castillo

Bridgette Castillo, Senior Commission Counsel
Enforcement Division

⁵<https://www.fppc.ca.gov/content/dam/fppc/NSDocuments/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁶ Regulations 18360.1 and 18360.3.

⁷ See Regulation 18361.5, subd. (e)(3).