

**State of California
Fair Political Practices Commission**

MEMORANDUM – PUBLIC DOCUMENT

Date: November 11, 2022

Subject: Closure - *In the Matter Tera Ludar*
(FPPC No. 2019-00559)

The Enforcement Division opened a commission-initiated investigation regarding an unidentified individual that was allegedly lobbying while unregistered and not filing lobbyist reports. Specifically, Tera Ludar was actively opposing SB 647 through direct communications, such as emails and phone calls, by contacting senators and state agencies on a regular basis. After conducting our investigation and review of the case, we are closing this matter because there is insufficient evidence to support a finding that there was a violation of the Act.

In order to fall under the jurisdiction of the Act, the person lobbying must be identified. Here, after a thorough investigation, the Enforcement Division was unable to identify Tera Ludar. In the investigation, we determined the phone number was pre-paid and untraceable, as well as the email address. Furthermore, Tera Ludar was a fictitious name and maintained no internet presence aside from a blank Facebook page. Therefore, because we do not have sufficient evidence of who the responsible person(s) were, we have closed our investigation in this matter.