



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

April 5, 2023

Karen Richardson
[REDACTED]

Warning Letter Re: FPPC No. 2020-00473: Karen Richardson

Dear Karen Richardson:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”). This letter is in response to a lobbyist nonfiler referral from the Secretary of State regarding your failure to timely file quarterly lobbyist reports (Form 615) for the last two quarters of 2019 and the first quarter of 2020.

The Act requires all registered lobbyists to complete the applicable lobbyist quarterly report (Form 615) for each calendar quarter, regardless of the level of activity.¹ Lobbyists file their Form 615 as an attachment to either the report of lobbyist employer (Form 635) or lobbying firm (Form 625).²

The Enforcement Division found that you failed to timely file three lobbyists reports for the final two quarters of 2019 and the first quarter of 2020. The Enforcement Division has determined to close your case with a warning letter for the following reasons: You had no reportable lobbying activity for the reporting periods at issue, you have been timely filing your lobbyist reports since the second quarter of 2020, your lobbying firm timely reported your activity, and you have no history with Enforcement.

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. Furthermore, the Enforcement Division expects Captor to file the appropriate lobbyist employer report as it still requires filing.

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

¹ Section 86113.

² Sections 86114(a)(4) and 86116(e)

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 Alex Rose at arose@fppc.ca.gov or 916- 327-6358 with any questions you may have regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Alex J. Rose". The signature is written in a cursive, slightly stylized font.

Alex J. Rose, Commission Counsel
Enforcement Division