



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

April 25, 2023

Christian Larsen
[REDACTED]

Warning Letter Re: FPPC No. 2022-00314; Christian Larsen

Dear Christian Larsen,

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 investigation which found that you failed to timely file two major donor campaign statements (Form 461) for the reporting periods of January 1, 2018 to June 30, 2018 and July 1, 2018 to December 31, 2018, and six 24-hour contribution reports (Form 497), despite qualifying as a major donor committee in 2018.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you qualified as a major donor committee on April 28, 2018 when you made a \$50,000 contribution to a primarily formed ballot measure committee, Affordable Housing for All, Yes on D. Subsequently, you made various contributions and failed to timely file a Form 461 disclosing your activity. Further, a few of the contributions qualified as a “late contribution” requiring the filing of a 24-hour contribution report, which you did not timely file.

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 must file a Form 461 covering the period of January 1 through June 30 by July 31 of the calendar year.³ And if additional contributions are made after June 30, a major donor must file a Form 461 covering the period of July 1 through December 31 by January 31 of the following calendar year.⁴

The Act also requires committees that make or receive a late contribution to file a 24-hour contribution report within 24 hours of making or receiving the contribution.⁵ A “late

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, subd. (c).

³ Section 84200, subd. (b).

⁴ *Id.*

⁵ Section 84203.

contribution” includes a contribution(s) aggregating \$1,000 or more that is made to or received by a committee primarily formed to support a candidate within 90 days before the date of the election, or on the date of the election, in which the pertinent candidate is to be voted on.⁶

Your actions violated the Act because you failed to timely file a Form 461 by the July 31, 2018 deadline and the January 31, 2019 deadline. You were required to file a Form 497 for various late contributions you made. However, you did not timely file a Form 497 for a \$50,000 late contribution made on April 28, 2018, a \$49,000 late contribution made on May 5, 2018, a \$10,000 late contribution made on June 5, 2018, a \$7,300 late contribution made on September 5, 2018, a \$50,000 late contribution and a \$1,000 late contribution made on September 20, 2018, and a \$10,000 late contribution made on October 9, 2018. However, the contributions were reported by the recipient committees, you have no prior Enforcement history, and the violations resulted in minimal public harm. 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 with this warning letter.⁷ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁸ This resolution may not be used as a comparable case for other enforcement matters.⁹

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.

Although the Enforcement Division is closing this case without seeking a penalty, you are still required to file all outstanding statements. Please contact your filing officer for further information. Any future non-filings may result in monetary penalties and this warning letter may be considered in any future enforcement actions.

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 your client with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If your client wishes to avail himself of these proceedings by requesting that his 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.

⁶ Section 82036.

⁷ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁸ Regulations 18360.1 and 18360.3.

⁹ See Regulation 18361.5, subdivision (e)(3).

If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact me at jrivera@fppc.ca.gov or 916-738-6411 with any questions you may have regarding this letter.

Sincerely,

Jonathan Rivera

Jonathan Rivera, Commission Counsel
Enforcement Division