



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

July 11, 2022

California Statewide Law Enforcement Association
c/o Andreas Rockas
Law Office of Andreas C. Rockas
Via Email: andy@rockaslaw.com

RE: No Action Closure Letter: FPPC No. 2021-00159

Dear Andreas Rockas:

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 sworn complaint alleging the California Statewide Law Enforcement Association's ("CSLEA") sponsored committees failed to itemize contributions of \$100 or more on applicable campaign statements. After conducting our review of the case, we are closing this matter without further action.

A multipurpose organization such as a professional association, that is a sponsor of a committee, may report required information on its sponsored committee campaign statements.² A multipurpose organization that is the sponsor of a committee, that is a membership organization, that makes all of its contributions and expenditures from funds derived from dues, assessments, fees, and similar payments that do not exceed \$10,000 per calendar year from a single source, and that elects to report its contributions and expenditures on its sponsored committee's campaign statement must report all contributions and expenditures made from the sponsor's treasury funds on statements and reports filed by the sponsored committee.³ The sponsor shall use a last in, first out accounting method and disclose the information required by subdivision (f) of Section 84211 for any person who pays dues, assessments, fees, or similar payments of \$1,000 or more to the sponsor's treasury funds in a calendar year and shall disclose all contributions and expenditures made, as required by subdivision (k) of Section 84211, on the sponsored committee's campaign statements.⁴

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.

² Section 84222, subd. (e)(1).

³ Section 84222, subd. (f).

⁴ Section 84222, subd. (f)(1).

CSLEA is a professional association that is funded by membership dues. CSLEA sponsors multiple state general purpose committees including CSLEA Independent Expenditure Committee (ID# 1254179), CSLEA Political Action Committee (ID# 970375), and CSLEA 1M Governors Fund (ID# 1221953). Since the membership dues transferred from CSLEA to its sponsored committees did not meet the \$1,000 threshold from a single source, the sponsored committees were not required to disclose the contributor information as required by subdivision (k) of Section 84211. Therefore, we are closing this matter without further action.

Should you have any questions regarding this letter, please feel free to contact me at (916) 323-6302 (voicemail) or JRinehart@fppc.ca.gov.

Sincerely,

Jenna Rinehart

Jenna C. Rinehart,
Commission Counsel
Enforcement Division

cc: Freedom Foundation @ mnelsen@freedomfoundation.com