



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

February 29, 2024

Jennifer Slater
o/b/o Shari Glazer
[REDACTED]

Warning Letter Re: FPPC No. 2024-00293; Shari Glazer

Dear Jennifer Slater,

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 the complaint you filed to self-report a violation of the campaign disclosure provisions of the Act on behalf of your client, Shari Glazer.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that your client qualified as a major donor committee by making a contribution of \$32,400 on July 29, 2021, but they failed to file a major donor committee campaign statement (Form 461) disclosing their activity by the January 31, 2022, deadline.

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. If the threshold is met in the latter six months of the calendar year, a major donor must file a Form 461 covering the period January 1 through December 31 by January 31 of the following calendar year.³

Your client's actions violated the Act because they failed to timely file a Form 461 covering the period January 1, 2021 through December 31, 2021 by the January 31, 2022 deadline. However, the Enforcement Division has decided to close this matter with a warning letter rather than a fine for the following reasons: The violation was self-reported, it appears this was your client's first

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(c)

³ Section 84200

time qualifying as a major donor, the missing Form 461 was filed prior to enforcement contact, and a 24-hour contribution report (Form 497) was timely filed to disclose the contribution.

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 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 herself of these proceedings by requesting that her 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 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 Shelby Pearce at spearce@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

James M. Lindsay

James M. Lindsay, Chief
Enforcement Division

JML: sp