



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

March 21, 2024

Ashlee Titus, atitus@bmhlaw.com
o/b/o Dan Feder

Warning Letter Re: FPPC No. 2023-00793, Dan Feder

Dear Dan Feder:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is sent in response to a Commission-initiated complaint alleging you failed to timely file major donor campaign statements and reports. Please note that the Enforcement Division settled additional violations, including four counts of failure to timely file major donor campaign statements (Form 461), in a streamline stipulation.

The Act requires major donor committees to file a 24-hour Contribution Report (Form 497) within 24 hours of the time a late contribution was made.²

Upon review, the Enforcement Division determined that you violated the Act by failing to timely file six Form 497s for the reporting periods ending on November 3, 2020, September 14, 2021, June 7, 2022, and November 8, 2022. However, mitigating circumstances exist here: you self-reported the violations prior to Enforcement’s discovery, at least one of the late contributions was reported by the recipient, you are inexperienced with the Act, and you have no prior 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.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the

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 84202.

Enforcement Division 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 me at 279-237-3752 or arose@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Alex Rose

Alex J. Rose
Commission Counsel,
Enforcement Division