



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

November 15, 2024

Sent Via Email: Lacey@keyslawcorp.com

Lacey Keys

O/B/O Angelo Farooq, Individually and

O/B/O Angelo Farooq for State Senate 2024

Jane Liederman



Warning Letter Re: FPPC No. 2024-00604; Angelo Farooq, Angelo Farooq for State Senate 2024, and Jane Liederman

Dear Lacey Keys:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act.¹ This letter is in response to a Commission initiated case in the above referenced matter regarding the failure to timely disclose treasurer services as accrued expenses on multiple campaign statements from January 1, 2021, through June 30, 2023.

The Enforcement Division has completed its review of the facts in this case. The Committee and Jane Liederman entered into a contract for treasurer services to be ongoing but paid in full the second half of 2023 in one lump sum of \$2,500. The Enforcement Division determined the Committee failed to timely disclose accrued expenses on the Semi-Annual campaign statements covering January 1, 2020, through June 30, 2023, identifying the ongoing services provided during these periods.

The Act requires committees to itemize expenditures made to a person during the period totaling \$100 or more and provide detailed information regarding those expenditures.² The Act’s definition of expenditure includes accrued expenses (i.e. unpaid bills), and any accrued expense which remains outstanding shall be reported on each campaign statement until the expense is paid or forgiven.³

Your clients’ actions violated the Act because they failed to report accrued expenses for the services provided from a professional treasurer on five campaign statements between January 1, 2020, through June 30, 2023. However, the Enforcement Division has decided to close this case with a

¹The 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 84211(i) and (k).

³ Regulation 18421.6.

warning letter rather than a fine because your clients disclosed these expenses on the campaign statement for the reporting period July 1, 2023, through December 31, 2023, when the payment was made, disclosed the payment made prior to the March 5, 2024 Primary Election, and have no prior history of violating this section of the Act.

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. 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 your clients wish to avail themselves of these proceedings by requesting that this 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 have questions regarding this letter, please contact me at bcastillo@fppc.ca.gov or (279) 237-3764.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division