



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

February 7, 2025

Casey Tanaka, Candidate and Treasurer
Casey Tanaka for Mayor 2024
Via email: [REDACTED]

Warning Letter Re: FPPC No. 2024-01355; Casey Tanaka for Mayor 2024, Casey Tanaka

Dear Casey Tanaka and Committee:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ As you are aware, the Enforcement Division received an anonymous complaint alleging that you violated the Act's campaign reporting provisions.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to accurately report an expenditure made by an agent ("subvendor payment") on your semi-annual campaign statement for the reporting period of January 1, 2024 through June 30, 2024.

The Act requires committees to disclose specific information on their campaign statements. Specifically, the Act requires that for expenditures of \$100 or more, the committee must report the full name of each person to whom an expenditure is made, as well as the person's street address, the amount of the expenditure, and a brief description of the expenditure.² An expenditure includes payments made by an agent or independent contractor, commonly referred to as "subvendor payments," of \$500 or more.³ An expenditure is made on the date the payment is made or on the date consideration is received.⁴

Your actions the Act because you failed to accurately report a subvendor payment on the semi-annual campaign statement for the reporting period of January 1, 2024 through June 30, 2024. The initial campaign statement disclosed a payment of \$4,320 to Kristian De Laurentis on Schedule E without corresponding subvendor disclosure. However, the Enforcement Division has decided to close this case with this warning letter rather than a fine because you amended the campaign statement immediately after you were contacted by the Enforcement Division to

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 84211(i)

³ Section 84211(k)

⁴ Section 82025(a)

disclose subvendor activity totaling \$4,239 on Schedule G of Form 460. Additionally, you were an unsuccessful candidate, and you have no 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. 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 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.

If you have any questions regarding this letter, please feel free to contact Vanessa Greer at vgreer@fppc.ca.gov or 279-237-5965.

Sincerely,

Christopher B. Burton

Christopher B. Burton, Assistant Chief
Enforcement Division

CBB: vg