



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

December 10, 2024

Mahmoud A. Shirazi

Via email: [REDACTED]

Warning Letter Re: FPPC No. 2024-01094; Mahmoud A. Shirazi

Dear Mahmoud Shirazi,

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 commission-initiated investigation regarding violations of the campaign disclosure provisions of the Act by failing to include all required information on campaign statements which led to a discrepancy in the total amount of contributions received and expenditures made.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you filed two pre-election campaign statements regarding the November 5, 2024, General Election covering the periods July 1, 2024 through September 21, 2024, and September 22, 2024 through October 19, 2024. However, you failed to disclose all contributions on your first pre-election statement and the total contributions received on the summary page did not match the total monetary contributions received on Schedule A for the same statement. Additionally, you failed to include the total cumulative amount of contributions received and expenditures made on your second pre-election statement summary page. You have since filed amendments to both pre-election campaign statements.

The Act requires candidate-controlled committees to disclose detailed information on their campaign statements. Specifically, the Act requires that committees disclose the cumulative amount of contributions received during the period covered by the campaign statement and total cumulative amount of contributions received.² Additionally, the Act requires committees to disclose the total amount of expenditures made during the period covered by the campaign statement and the total cumulative amount of expenditures made.³ Moreover, the Act requires candidate-controlled committees to file 24-Hour Contribution Reports (Form 497) if the committee

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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 84211 (a)

³ Section 84211(b)

receives a contribution(s) totaling \$1,000 or more from a single source during the 90 days preceding the applicable election or on the date of the election.⁴

Your actions violated the Act because you failed to report a personal contribution in the amount of \$5,000 on the first pre-election campaign statement covering the period of July 1, 2024 through September 21, 2024. Additionally, your first pre-election campaign statement failed to include the proper figures calculated and carried over, as directed on the instruction page of the campaign statement. Furthermore, you failed to include the cumulative totals of expenditures made and contributions received on your second pre-election campaign statement. Finally, you failed to timely file and disclose the \$5,000 personal contribution on a Form 497. However the Enforcement Division has decided to close this case with a warning letter rather than a fine because you filed amendments to the pre-election campaign statements immediately after you were contacted by the Enforcement Division, the \$5,000 contribution was reported on your amended first pre-election statement that was filed prior to the election, you were unsuccessful, and you have no prior history of violating 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 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.

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⁴ Section 82036 and 84203

Please feel free to contact Laura Columbel at lcolumbel@fppc.ca.gov or (279) 237-5974 with any questions you may have regarding this letter.

Sincerely,

Laura Columbel

Laura Columbel
Commission Counsel
Enforcement Division