



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

July 3, 2024

Peter Sullivan o/b/o
Dulce Vasquez Elect Immigrants PAC
Dulce Vasquez
Via email: psullivan@seowenscompany.com

Warning Letter Re: FPPC No. 2024-00665; Dulce Vasquez Elect Immigrants PAC, Dulce Vasquez

Dear Peter Sullivan:

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 Dulce Vasquez violated the campaign disclosure provisions of the Act. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that Vasquez filed Form 410 (Statement of Organization) to establish a general purpose committee to support immigrants running for public office.

Under the Act, a candidate may only have one controlled committee and bank account for election to office², and may not control a committee making expenditures for or against other candidates. A candidate maintains that status until the candidate leaves all offices and no longer maintains any committee(s).³ A controlled committee is defined as a committee that is controlled directly or indirectly by a candidate or that acts jointly with a candidate, the candidate’s agent, or any other committee the candidate has a significant influence on the actions or decisions of the subject committee.⁴

As the Principal Officer for the committee, it is presumed Dulce Vasquez was controlling the committee. Vasquez violated the Act by establishing a second candidate-controlled committee and campaign bank account to support other candidates.

However, for the following reasons, the Enforcement Division has decided to close this case with this warning letter rather than a fine: The only contributions received were loans from Vasquez’s

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 85201

³ Section 84214 and Regulation 18404.

⁴ Section 82016.

personal funds, no expenditures were made by the committee to support or oppose other candidates, and the committee has since been terminated.

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

Sincerely,

Christopher B. Burton

Christopher B. Burton, Assistant Chief
Enforcement Division

CBB: sp