



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

July 17, 2024

National Women's Political Caucus – Los Angeles Metro

Tricia Robbins



Warning Letter Re: FPPC No. 2021-00964; National Women's Political Caucus Los Angeles Metro PAC and Tricia Robbins

Dear Committee and Tricia Robbins:

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 referrals from the County of Los Angeles alleging that National Women's Political Caucus Los Angeles Metro PAC ("the Committee") failed to timely file five semi-annual campaign statements. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that the Committee failed to timely file five semi-annual campaign statements for the reporting periods ending December 31, 2020, June 30, 2021, December 31, 2021, June 30, 2022, December 31, 2022, by the applicable due dates. Additionally, the Committee failed to include the current address on the Committee's statement of organization. Lastly, the Committee failed to file a pre-election campaign statement for the reporting period ending October 17, 2020.

A central purpose of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring committees to disclose all contributions received and expenditures made throughout a campaign on timely filed campaign statements and reports.² The Act requires general purpose committees to file semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.³ The obligation to file semi-annual campaign statements continues until the treasurer terminates the committee.⁴ The Act also require committees to file an amendment within 10 days to reflect any changes to information contained in the statement of organization.⁵ Lastly, the Act

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 81002, subd. (a); Section 84200, *et seq.*

³ Section 84200.

⁴ Section 84214 and Regulation 18404.

⁵ Section 84103

requires general purpose committees who make contributions or independent expenditures totaling \$500 or more during the pre-election reporting periods to file pre-election campaign statements by their respective due dates.⁶ Committee treasurers are jointly and severally liable for violations by the committee.⁷

The Committee failed to timely file five semi-annual campaign statements and one pre-election campaign statement, as discussed above. Additionally, the Committee failed to timely update their statement of organization. However, the Enforcement Division has decided to close this case with a warning letter because the Committee filed the semi-annual campaign statements with the Los Angeles County after being contacted by the Enforcement Division, the Committee also updated their statement of organization to reflect their current Committee address, there was a low amount raised and spent regarding the election, and the Committee does not have a recent enforcement history.

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 Regulations 18360.1 and 18360.2 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 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 10 days from the date of this letter.

Please feel free to contact me at 279-237-3766 or cfelkins@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Michael C. Felkins

Michael C. Felkins, Commission Counsel
Enforcement Division

⁶ Section 84200.5

⁷ Sections 83116.5 and 91006.

cc: Los Angeles County Registrar-Recorder: DColucci@rrcc.lacounty.gov