



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

April 17, 2024

Allison Bhusri
c/o Emily B. Erlingsson, Special Counsel (San Francisco)
Pillsbury Winthrop Shaw Pittman LLP
emily.erlingsson@pillsburylaw.com

Warning Letter re: FPPC Case No. 2021-00699; Allison Bhusri

Dear Allison Bhusri:

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.

When a person makes contributions totaling \$10,000 or more in a calendar year, that person qualifies as a major donor committee. If the \$10,000 threshold is met during the first six months of the calendar year, the major donor must file a Form 461 campaign statement, covering the reporting period of January 1 through June 30—by the due date of July 31. If additional contributions are made later in the calendar year, they must be reported on another Form 461, covering July 1 through December 31, by the due date of January 31 of the following year.²

Also, when a person who has qualified as a major donor committee makes a late contribution, that person must file a Form 497 24-hour report within 24 hours of making the contribution. A late contribution includes any contribution(s) aggregating \$1,000 or more, where the recipient is any of the following: a candidate on the ballot for an election scheduled to be held within the next 90 days; a ballot measure committee for a measure that is on the ballot during a similar time frame; or a committee that is primarily formed to support or oppose any such candidate/measure on the ballot during the next 90 days.³

During the first half of 2018, you made three contributions totaling \$24,500, and you reported this activity on a Form 461 filed for the period ending June 30, 2018—but your filing was about 1,129 days late—in violation of Section 84200, subdivision (b).

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 See Sections 82013, and 84200, subdivision (b).

³ See Sections 82036 and 84203.

During the second half of 2018, you made a contribution in the amount of \$250, and you reported it on a Form 461 filed for the period ending December 31, 2018—but your filing was about 945 days late—in violation of Section 84200, subdivision (b).

You violated the Act by late filing your Form 461s as noted above. However, the committees who received your contributions timely disclosed receipt on their own campaign filings. Also, you have no history of prior, similar violations of the Act. Additionally, you cooperated with the Enforcement Division by entering into a tolling agreement with respect to the statute of limitations. Therefore, we are closing this case with this warning letter.

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 Act in the future may result in monetary penalties as high as \$5,000 per 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 need guidance regarding your obligations in the future, please visit our website at www.fppc.ca.gov/advice.html or call the Commission's Toll-Free Advice Line at 1-866-ASK-FPPC (1-866-275-3772).

Thank you for your attention to this matter. Do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

Neal P. Bucknell
Senior Commission Counsel
Enforcement Division
nbucknell@fppc.ca.gov
(279) 237-5938