



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

September 20, 2024

Rajkanwal Nagra
Ravinderjeet Sing
Nagra for Lathrop City Council 2020



**Warning Letter Re: FPPC No. 2021-00728; Nagra for Lathrop City Council 2020,
Rajkanwal Nagra, and Ravinderjeet Sing**

Dear Committee, Rajkanwal Nagra and Ravinderjeet Sing:

The Enforcement Division of the Fair Political Practice Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a referral from the City of Lathrop, alleging that the committee, Nagra for Lathrop City Council 2020 (the “Committee”), failed to file a semi-annual campaign statement due January 31, 2021. The Enforcement Division has completed its review of the matter. Specifically, we found that the Committee failed to timely file eight semi-annual campaign statements, two 24-hour contribution reports, and an amendment to the statement of organization to disclose the Committee’s date of qualification. Lastly, the Committee failed to include the date of the Committee’s loan incurred on a pre-election statement.

The Act requires committees to file two pre-election campaign statements prior to the applicable election in which the candidate is listed on the ballot.² Candidate-controlled committees are required 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 candidate or treasurer terminates the committee.⁴ The cumulative amount of a loan received by a committee, \$100 or more, must include the original date and amount of each loan, it must also include the due date and interest rate of the loan.⁵ Additionally, if a candidate-controlled committee receives a contribution(s) totaling \$1,000 or more from a single source within the 90 days before the election, or on the date of the election, the committee is required to file a Form 497 within 24 hours of receiving the contribution.⁶ Lastly, the Act requires recipient committees to file a Form 410 with the Secretary

¹ The Political Reform Act is contained in Government Code section 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practice Commission are contained in Section 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 84200.5.

³ Section 84200

⁴ Section 84214.

⁵ Section 84211(g)

⁶ Section 84203.

of State's office to establish a committee within 10 days of meeting/exceeding a \$2,000 committee qualification threshold.⁷

Your actions violated the Act because the Committee failed to timely file a semi-annual campaign statement by the January 31, 2021 deadline. Additionally, The Committee failed to file semi-annual campaign statements for both deadline periods in 2021, 2022, 2023 and the July 31, 2024 deadline. The Committee also failed to report the date a loan was received on the pre-election campaign statement due October 22, 2020. In addition, the Committee failed to timely file a 24-hour contribution report due September 11, 2020 and failed to file a 24-hour contribution report for the \$4,000 loan received between September 20, 2020 and October 17, 2020. Lastly, the Committee failed to timely file a Statement of Organization by the September 20, 2020 deadline. However, the Enforcement Division has decided to close this case with a warning letter rather than a fine because you had a lack of experience with these specific requirements of the Act, you were unsuccessful in the 2020 General Election, a majority of the violations do not relate to the 2020 election, you paid a penalty to your local filing officer, the late-filed 24-hour report was filed prior to the election, the violation resulted in minimal public harm, 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. 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

⁷ Section 84101.

cc: filing officer