



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

December 9, 2025

AFSCME Local 3993
Vivian Gunderson (Treasurer)
Sent via email: [REDACTED]

Warning Letter Re: AFSCME Local 3993 and Vivian Gunderson (Treasurer); FPPC No. 2020-01059.

Dear Committee and Vivian Gunderson:

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 sworn complaint alleging that you and the Committee violated the Act by failing to timely report various contributions made and received related to the November 3, 2020 election. The Enforcement Division has completed its investigation and found that you and the Committee failed to timely file three pre-election campaign statements, seven 24-hour Contribution Reports, and eight semiannual campaign statements.

The Act requires candidate-controlled committees to file semiannual and pre-election campaign statements periodically², and 24-hour late contribution reports 24 hours after a committee receives contribution(s) totaling \$1,000 or more from a single source within 90 days before the election, or on the date of the election.³ The obligation to file these campaign statements and reports remains in effect until the committee is terminated. Committees and their treasurers are jointly and severally liable for any violations committed by the committee.⁴

You and the Committee violated the Act by failing to timely file the following campaign statements/ reports:

Statement/Report	Reporting Period	Due Date	Date Filed
Pre-election	7/1/20-9/19/20	9/24/20	1/4/25
24-hour Contribution Report	9/9/2020	9/10/20	11/3/20

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 Sections 84200 and 84200.5.

³ Section 84203.

⁴ Sections 83116.5 and 91006.

24-hour Contribution Report	9/19/20	9/20/20	11/3/20
Pre-election	9/20/20-10/17/20	10/22/20	1/4/25
24-hour Contribution Report	9/23/20	9/24/20	Not Filed
Semiannual	10/18/20-12/31/20	2/1/21	1/4/25
24-hour Contribution Report	10/23/20	10/24/20	Not Filed
24-hour Contribution Report	10/28/20	10/29/20	11/3/20
Semiannual	1/1/21-6/30/21	8/1/21	1/4/25
Semiannual	7/1/21-12/31/21	1/31/22	1/4/25
Semiannual	1/1/22-6/30/22	8/1/22	1/4/25
Pre-election	7/1/22-10/22/22	10/27/22	1/4/25
24-hour Contribution Report	10/3/22	10/4/22	11/7/22
Semiannual	10/23/22-12/31/22	1/31/23	1/4/25
Semiannual	1/1/23-6/30/23	7/31/23	1/4/25
Semiannual	7/1/23-12/31/23	1/31/24	1/4/25
Semiannual	1/1/24-6/30/24	7/31/24	1/4/25
24-hour Contribution Report	8/29/24	8/30/24	Not Filed

Despite these violations, however, the Enforcement Division has decided to close this case with this warning letter rather than impose a fine for the following reasons: you have no prior enforcement history, the amount of activity the Committee had related to the participating elections was relatively low, three 24-hour Contribution Reports were filed on the election date, you have filed the outstanding campaign statements and reports, so the Committee's financial activity is now sufficiently disclosed to the public, and the violations were not a result of intentional behavior. Additionally, you have paid the Secretary of State over \$8,000 in late fees related to some of these filings.

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 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 have any questions about this letter, please do not hesitate to contact me at cbernabe@fppc.ca.gov or at (279)237-5978.

Sincerely,

Cinthya Bernabé

Cinthya Bernabé, Commission Counsel
Enforcement Division