



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

July 15, 2025

Amber Maltbie
o/b/o Leah Culver
Via email: amaltbie@nossaman.com

Warning Letter Re: FPPC No. 2024-01147; Leah Culver

Dear Amber Maltbie,

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 self-referral regarding your client, Leah Culver’s, obligation to file Major Donor Campaign Statements (Form 461). The Enforcement Division has completed its review of the facts in this case. Specifically, we found that your client qualified as a major donor committee for the years 2021, 2022, and 2023 and failed to timely file four Form 461s for the applicable reporting periods.

Under the Act, an individual or entity that makes contributions totaling \$10,000 or more in a calendar year qualifies as a major donor committee and incurs filing obligations.² If the \$10,000 threshold is met in the first six months of the calendar year, a major donor committee must file a Form 461 covering the period of January 1 through June 30 by July 31 of the calendar year.³ 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.⁴

Your client’s actions violated the Act by failing to timely file a Form 461 for the reporting periods ending December 31, 2021, December 31, 2022, June 30, 2023, and December 31, 2023, by the applicable deadlines. However, the Enforcement Division has decided to close this matter with this warning letter rather than issue a fine because this was your client’s first time qualifying as a major donor committee, you self-reported the violations on behalf of your client, your client filed the outstanding statements, the amount contributed was fairly low, and your client does not have a prior 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

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 82013, subd. (c).

³ Section 84200, subd. (b).

⁴ *Id.*

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 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 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 himself of these proceedings by requesting that his 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 forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact me at jrivera@fppc.ca.gov or 279-237-5913 with any questions you may have regarding this letter.

Sincerely,

Jonathan Rivera

Jonathan Rivera, Commission Counsel
Enforcement Division