



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

June 19, 2025

Asian Americans in Action PAC

Via email: aaactionpac@gmail.com

Warning Letter Re: FPPC No. 2022-00245; Asian Americans in Action PAC

Dear Asian Americans in Action PAC:

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 alleging that you failed to comply with the Act’s campaign filing provisions. The Enforcement Division has completed its review of the facts in this case. Specifically, we found that you failed to timely file your Statement of Organization and one semiannual campaign statement by the specified deadlines.

According to the Act, a multipurpose organization is a recipient committee if the multipurpose committee is a political committee registered with the Federal Election Commission, and the multipurpose organization makes contributions in this state in an amount equal to or greater than \$2,000.² A recipient committee shall file a statement of organization.³ The committee shall file the original of the statement of organization with the Secretary of State and shall also file a copy of the statement of organization with the local filing officer, if any, with whom the committee is required to file an original campaign statement.⁴ In addition to filing the statement of organization, if a committee qualifies as a committee under subdivision (a) of Section 82013 before the date of an election in connection with which the committee is required to file preelection statements, but after the closing date of the last campaign statement required to be filed before the election, the committee shall file, by facsimile transmission, online transmission, guaranteed overnight delivery, or personal delivery within 24 hours of qualifying as a committee, the information required to be reported in the statement of organization.⁵ The information required by this subdivision shall be filed with the filing officer with whom the committee is required to file an original campaign statement.⁶ According to the Act, recipient

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 84222(c)(1).

³ Section 84101(a).

⁴ Ibid.

⁵ Section 84101(b).

⁶ Ibid.

committees shall file semiannual 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 31.⁷

You violated the Act because you failed to file your Statement of Organization within 24 hours of qualifying as a recipient committee on October 26, 2020 after giving \$2,000 in contributions to local California candidates. After qualifying as a committee, you failed to file one semiannual campaign statement for the period of January 1, 2020 through December 31, 2020. However, we are closing this matter with a warning letter because you were inexperienced with the requirements of the Act, the violations caused minimal public harm because of low activity during the missing reporting periods, the low amount raised and spent for the election, the activity was disclosed by the recipients of the contributions, and the committee raised and spent less than \$10,000 for the relevant election. Additionally, the committee had filed election disclosure forms with the Federal Elections Commission, providing some public disclosure.

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.

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

Sincerely,

Jonathan Rivera

Jonathan Rivera,
Commission Counsel
Enforcement Division

⁷ Section 84200.