



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

March 14, 2025

Nina Marino
[REDACTED]

o/b/o Yorai “Benny” Benzeevi and
Healthcare Conglomerate Associates, LLC

Via email: [REDACTED]

Re: No Action Closure Letter - FPPC Case No. 2019-00333; In the Matter of HealthCare Conglomerate Associates, LLC; and Yorai “Benny” Benzeevi

Dear Respondents,

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ As you know, the Fair Political Practices Commission opened a proactive enforcement action based on an article published in the New Yorker on February 13, 2019 regarding efforts to influence a local election in Tulare, California. The Enforcement Division investigated the matter and determined that a committee was created and that it subsequently failed to timely file two 24-hour independent expenditure reports, failed to timely file two semiannual campaign statements, and failed to include the required disclosures on two print advertisements.

Yorai Benzeevi (“Benzeevi”) is the sole owner and president of Health Care Conglomerate Associates (“HCCA or the Committee”). HCCA qualified as an independent expenditure committee that opposed a ballot measure to recall Parmod Kumar (“Kumar”) from the Tulare Local Healthcare District Board of Directors (“the Recall”) and replacement candidate Senovia Guterrez (“Guterrez”) in a July 11, 2017 Special Election in Tulare County. In 2017, the Committee paid a private intelligence company, based out of Israel, called Psy Group, to run a covert operation to influence the Recall in favor of Kumar and against Gutierrez, through the production of communications that expressly advocated the defeat of the Recall and, were the Recall to succeed, the defeat of replacement candidate Gutierrez.

The Committee made \$230,000 in independent expenditures in advance of the election, thereby meeting the \$1,000 threshold, and qualifying as an independent expenditure committee with reporting and disclosure obligations under the Act. The Committee failed to meet those obligations by failing to timely file two 24-hour independent expenditure reports, failing to timely file two semiannual campaign statements covering the reporting periods of January 1, 2017 to June 30, 2017 and July 1, 2017 to December 31, 2017 and failing to include the required disclosures on two print

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.

advertisements. Yorai “Benny” Benzeevi (“Benzeevi”), the former CEO, and managing member, of HCCA, aided and abetted, and acted in concert with, the Committee in its violations of the Act.

In addition to an investigation with the Fair Political Practices Commission, the Tulare County District Attorney’s Office also investigated related matters parallel to the investigation in this case. On February 9, 2024, the Tulare County Superior Court accepted a plea agreement with Benzeevi and the District Attorney. Benzeevi pled no contest to eight counts which included conflict of interest, violations of Government Code Section 1090, failure to report independent expenditures, and using his official position for personal gain. Additionally, as part of the plea agreement, Benzeevi paid \$2.4 million in restitution, was sentenced to two years felony probation, 600 hours of community service “which can be performed at any healthcare facility,” and was to serve 120 days of electronic monitoring.

The allegations made in the complaint received by the Enforcement Division have been sufficiently addressed in another forum. Therefore, the Enforcement Division is closing this matter with no further action.

If you have any questions regarding this matter, please feel free to contact me at (279) 237-5932 or at MCorona@fppc.ca.gov

Sincerely,

Marissa Corona

Marissa Corona
Senior Commission Counsel
Enforcement Division