



CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811 • (916) 322-5660

August 29, 2025

Ben Van Zutphen

Sent via email to: [REDACTED]

Warning Letter re: FPPC Case No. 2025-00934; Ben Van Zutphen

Dear Ben Van Zutphen:

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 which found that you failed to timely file a major donor campaign statement (Form 461) for the reporting period of January 1, 2022 through December 31, 2022, by the January 31, 2023 due date, despite qualifying as a major donor committee.

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 an individual directs or controls an entity’s contributions, the entity’s contributions must be aggregated with contributions made by that individual and any other entity whose contributions that individual directs or controls.³ If the \$10,000 threshold is met during the last six months of the calendar year, a major donor committee must file a Form 461 covering the reporting period ending December 30 by January 31 of the following calendar year.⁴ If a person has not previously filed a campaign statement, the period covered begins on January 1.⁵

You violated the Act by failing to timely file a Form 461 for the reporting period of January 1, 2022 through December 31, 2022, by the January 31, 2023 due date. However, mitigating evidence exists such that the Enforcement Division has decided to close this case with a warning letter. This was your first time qualifying as a major donor, the contribution amount was relatively low, the recipient committee timely disclosed the contributions resulting in minimal public harm, half the contributions were later returned to you, you filed a Form 461 for the

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 82015.5, subd. (b).

⁴ Section 84200, subd. (b).

⁵ Section 82046, subd. (b).

reporting period of July 1, 2022 to December 31, 2022 to disclose the contributions you made or directed throughout 2022, and you have no 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 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.

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 JRinehart@fppc.ca.gov or (279) 237-5910 with any questions you may have regarding this letter.

Sincerely,

Jenna Rinehart

Jenna C. Rinehart
Senior Commission Counsel
Enforcement Division