



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

January 15, 2026

Haun Nguyen  
Via email

Jay Smith  
Attorney of record for Lucia Vo  
Via email

Long Pham  
On behalf of Vietnamese American Voter Foundation  
Via email

**Re: Warning Letter re FPPC No. 2020-00948; Vietnamese American Voter Foundation,  
Huan Nguyen, and Lucia Vo**

Dear all:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> As you are aware, the Enforcement Division received a sworn complaint alleging that the committee, the Vietnamese American Voter Foundation (“VAVF”), failed to properly report independent expenditures or file campaign statements. The Enforcement Division has completed its investigation and review of the matter. The investigation confirmed that the Committee failed to timely file two pre-election campaign statements and failed to timely file four semiannual campaign statements. Huan Nguyen was the principal officer and a controlling candidate in 2020 and Lucia Vo was the treasurer of record.

The Act has a comprehensive reporting system, intended to provide transparency and disclosure of political activity of both the persons who make contributions and how committees spend these contributions.<sup>2</sup> The Act defines a candidate-controlled committee as a committee that is “controlled directly or indirectly by a candidate... or that acts jointly with a candidate... in connection with making expenditures.”<sup>3</sup> A controlled committee is required to include the name of the candidate in the name of the committee.<sup>4</sup> A general purpose committee is required to file

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<sup>1</sup> 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.

<sup>2</sup> Section 84200, *et seq.*

<sup>3</sup> Section 82016.

<sup>4</sup> Regulation 18402.

pre-election statements when the committee makes contributions or independent expenditures totaling five hundred dollars or more to a support or oppose a candidate.<sup>5</sup> Committees are required to file regular campaign statements, including a statement due on July 31, for the period ending June 30, and a statement due on January 31, for the period ending July 31.<sup>6</sup> For expenditures that are in support of or opposed to candidates on the ballot, the committee must disclose additional information, including but not limited to identifying whether the expenditure was a contribution or an independent expenditure, the identified candidate, the office sought, and the relevant jurisdiction.<sup>7</sup>

During the 2020 General Election, Nguyen was an unsuccessful candidate for the City of Garden Grove City Council. VAVF violated the Act by failing to disclose that the committee was candidate-controlled and by failing to include the name of the candidate in the committee's name. VAVF was active during the 2020 General Election, supporting Nguyen and one other candidate, and subsequently reported minimal or no activity on statements that reported activity from 2020 to 2025. The investigation determined that VAVF and Nguyen were connected and that in 2020, Nguyen utilized VAVF to make expenditures in support of Nguyen's candidacy. Therefore, during the 2020 General Election, VAVF was controlled by a candidate. VAVF made at least \$500 in contributions to candidates on the ballot and was therefore required to file pre-election campaign statements but failed to timely file pre-election statements. Activity was disclosed after the election on a timely filed semiannual campaign statement. On a filed campaign statement, VAVF failed to disclose the additional information required for expenditures that were in support of candidates on the ballot. VAVF failed to timely file the pre-election campaign statements in connection with the 2020 General Election and failed to timely file semiannual statements for the reporting periods ending on June 30, 2022; December 31, 2022; June 30, 2023; and December 31, 2023.

With respect to these findings the Enforcement Division has determined that mitigating circumstances exist here. The Committee has no prior history of enforcement actions. There is evidence that the committee involved made a good-faith attempt to comply with the reporting requirements of the Act. The individuals involved had a low level of experience with the Act. The total activity involved in this matter was low. Additionally, VAVF and Nguyen have agreed to and paid a streamline settlement for additional violations, including failure to include correct disclosure on advertisements. Based on the foregoing, the Enforcement Division is closing this case with this warning letter.

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.

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<sup>5</sup> Section 84200.5, subdivision (a)(3).

<sup>6</sup> Section 84200.

<sup>7</sup> Section 84211, subdivision (k)(5).

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 regarding this letter, please contact Theresa Gilbertson at [tgilbertson@fppc.ca.gov](mailto:tgilbertson@fppc.ca.gov) or by phone at (279) 237-5960.

Sincerely,

*Theresa Gilbertson*

Theresa Gilbertson  
Attorney Supervisor  
Enforcement Division

CC: Kim Nguyen, Sworn Complainant