

August 14, 2019

Direct (213) 452-6550

VIA EMAIL & U.S. MAIL

Galena West
Chief, Enforcement Division
Fair Political Practices Commission
1102 Q Street, Suite 3000
Sacramento, CA 95811

Re: Self-Referral – Todd Gloria for Assembly 2020
Our File No.: GLO2362.004

Dear Ms. West:

We are writing on behalf of Todd Gloria for Assembly 2020 (“Committee”) (ID No. 1416118), to advise you of an issue regarding the Committee’s compliance with the Political Reform Act of 1974, as amended.

The Committee, which qualified in February of this year, is a controlled committee of Assemblymember Todd Gloria. Since its formation, the committee received a carryover transfer (*i.e.*, miscellaneous increase to cash) of \$293,078 from the Assemblymember’s 2018 Assembly committee, and approximately \$34,000 in contributions.

Upon review of the Committee’s records following a press inquiry, it appears that the Committee’s treasurer inadvertently failed to file a Form 501 – Candidate Intention Statement at the time the Committee was initially formed. The Form 501 has since been filed, a date-stamped copy of which is enclosed. Otherwise, the Committee has properly and timely reported all of its activities, as required by the Political Reform Act.

We do not believe that the Committee’s inadvertent oversight warrants any further action. Nonetheless, in determining what action, if any, to take against the Committee, we urge you to consider the totality of the facts and circumstances giving rise to this matter, including the fact that the Committee filed the Form 501 as soon as it discovered that it had not been filed; the public harm was negligible because the Form 410 – Statement of Organization filed by the committee upon its formation, contained virtually identical information as is listed on the Form 501; the contributions received by the Committee to date have been small in number and total a relatively small amount; and the Form 501 has been filed well before the election. Finally, we ask you to take into account that, upon becoming aware of this issue, the Committee decided to proactively present this matter to you for a speedy resolution of the issue.

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Please feel free to contact us should you require any additional information to evaluate the facts and circumstances involved in this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "S. Kaufman", with a long horizontal flourish extending to the right.

Stephen J. Kaufman

SJK:vcc

Enclosure

Candidate Intention Statement

RECEIVED AND FILED in the office of the Secretary of State of the State of California AUG 13 2019	CALIFORNIA FORM 501 For Official Use Only
	Hand Delivered, Sacramento

Check One: Initial Amendment (Explain) _____

1. Candidate Information:

NAME OF CANDIDATE (Last, First Middle Initial)		DAYTIME TELEPHONE NUMBER	FAX NUMBER (optional)	EMAIL (optional)
Gloria, Todd		(619) 708-9744	()	
STREET ADDRESS		CITY	STATE	ZIP CODE
374 N. Coast Hwy 101, Suite 2		Encinitas	CA	92024
OFFICE SOUGHT (POSITION TITLE)	AGENCY NAME	DISTRICT NUMBER, if applicable.	<input type="checkbox"/> NON-PARTISAN OFFICE	
Assemblymember	State of California	78	PARTY PREFERENCE: Democratic	
OFFICE JURISDICTION		(Check one box, if applicable.)		
<input checked="" type="checkbox"/> State (Complete Part 2.)		2020 <input checked="" type="checkbox"/> PRIMARY / GENERAL		
<input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Multi-County: _____		<input type="checkbox"/> SPECIAL / RUNOFF		
		(Name of Multi-County Jurisdiction)		
		(Year of Election)		

2. State Candidate Expenditure Limit Statement:

(CalPERS and CalSTRS candidates, judges, judicial candidates, and candidates for local offices do not complete Part 2.)

(Check one box)

I accept the voluntary expenditure ceiling for the election stated above.

I do not accept the voluntary expenditure ceiling for the election stated above.

Amendment:

I did not exceed the expenditure ceiling in the primary or special election held on: ____/____/____ and I accept the voluntary expenditure ceiling for the general or special run-off election.

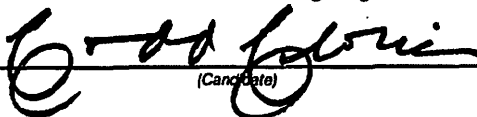
(Mark if applicable)

On ____/____/____, I contributed personal funds in excess of the expenditure ceiling for the election stated above.

3. Verification:

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/13/2019
(month, day, year)

Signature 
(Candidate)



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

August 23, 2019

Stephen Kaufman
Kaufman Legal Group
o/b/o Assemblymember Todd Gloria & Todd Gloria for Assembly 2020
Via email: skaufman@kaufmanlegalgroup.com

Re: FPPC Case No. 19/969; Todd Gloria for Assembly 2020 & Todd Gloria

Dear Mr. Kaufman:

On August 14, 2019, on behalf of your client, Todd Gloria and Todd Gloria for Assembly 2020, you notified the Enforcement Division of the Fair Political Practices Commission of a potential violation of the Political Reform Act's (the "Act") campaign disclosure provisions related to Mr. Gloria's late filing of the Form 501 – Candidate Intention Statement.

In response to the letter, the Enforcement Division has opened a case on the matter. At this time, we have not made any determination about the possible violations. We are simply providing you with this information as a courtesy and may be contacting you to discuss the matter. If you have any questions regarding this letter, please contact Chloe Hackert at chackert@fppc.ca.gov.

Sincerely,

Galena West, Chief
Enforcement Division

GW:ch