



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

September 14, 2020

Gary S. Winuk
Kaufman Legal Group
o/b/o Gregory Lin Tanaka
Via email at: gwinuk@kaufmanlegalgroup.com

Re: FPPC COM-08032020-01283; Notice of Rejected Complaint

Dear Mr. Winuk:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act¹ (the “Act”). As you are aware, on August 13, 2020, the Enforcement Division informed your client that we were considering initiating an investigation regarding a possible violation of the Act’s campaign disclosure provisions. Based on a review of the complaint and the information provided, the Enforcement Division will not pursue an enforcement action in this matter.

You have since explained that most of the expenditures identified in the complaint are related to Mr. Tanaka’s officeholder duties as a Councilmember of Palo Alto. The expenditures were related to constituent outreach challenges in response to the pandemic. However, one of the alleged expenditures to Google for \$67.46 for canvassing costs was mislabeled. Since the expense was under \$100 which does not require itemization on the campaign statement under Section 84211(k) of the Act, we will not pursue this matter further.

Thank you for providing a response to our letter of inquiry. If you have any questions regarding this letter, please contact Chloe Hackert at (916) 322-8190 or chackert@fppc.ca.gov.

Sincerely,

Galena West, Chief
Enforcement Division

GW/ch

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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.