



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329

October 6, 2016

Gary Winuk
Kaufman Legal Group
o/b/o Tom Walsh
UNITE HERE Local 11
Via Email: gwinuk@kaufmanlegalgroup.com

Re: Sworn Complaint Against Beverly Hills Residents and Businesses to Preserve Our City, No on HH, Sponsored by Wanda Beverly Hills Properties, LLC and Athens BH Development, LLC with Major Funding from Lakeshore East Parcel P, LLC

Dear Mr. Winuk:

This letter is in response to your sworn complaint. The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act") found in Government Code Section 81000, *et seq.* You allege the Beverly Hills Residents and Businesses to Preserve Our City, No on HH, Sponsored by Wanda Beverly Hills Properties, LLC and Athens BH Development, LLC with Major Funding from Lakeshore East Parcel P, LLC committee ("No on HH") violated the Act by accepting a contribution from a foreign principal, The Wanda Group, a Chinese company.

In this case, we found no evidence the contributor, Lakeshore East Parcel P, LLC ("Lakeshore"), is a foreign principal. Evidence provided to the Enforcement Division indicates that Lakeshore loaned \$1.2 million to Wanda Beverly Hills Properties, LLC in order for Wanda Beverly Hills Properties, LLC to make a contribution to No on HH. The No on HH committee received advice from the Fair Political Practices Commission's Legal Division regarding the proper reporting and disclosure of this contribution and were instructed to report Lakeshore as the contributor and Wanda Beverly Hills Properties, LLC as the intermediary. Your complaint did not provide evidence to substantiate the allegation that a foreign principal was the source of the money loaned by Lakeshore to Wanda Beverly Hills Properties, LLC. Therefore, the Enforcement Division will not open a case on this matter.

Thank you for taking the time to bring this matter to our attention. If you have any questions regarding this decision, please contact Teri Rindahl at (916) 327-2018 or trindahl@fppc.ca.gov.

Sincerely,

Galena West
Chief, Enforcement Division

GW/tr

cc: Sutton Law Firm o/b/o Beverly Hills Residents and Businesses to Preserve Our City, No on HH