

COMPLAINT RECEIVED

The Enforcement Division of the Fair Political Practices Commission received the enclosed complaint, COM-09242020-01905, on 9/24/2020 2:04:00 PM. The information filed in the complaint is below and any attachments filed will be included.

The Complaint was formally filed against:

Andrew Do for Supervisor 2020
Respondent

Mario Jr Angeles
Complainant

The Violations alleged are:

Laundered Campaign Contributions
Contributions by Intermediary or Agent (84302)
Complaint for Political Money Laundering, Disguising True Source of Political Campaign Donations to Skirt Campaign Limits, and other Violations of the California Political Reform Act (Government Code sections 81000 – 91014), Orange County TIN-CUP ordinance (ORDINANCE NO. 17-002), and applicable sections of the California Penal Code.

I am writing to file a formal complaint against Orange County Supervisor Andrew Do and the Orange County Republican Party for engaging in various illegal acts under the California Political Reform Act, including money laundering.

Specifically, on September 11, 2020, and as reflected in the attached 497, Supervisor Andrew Do donated \$24,000 from his "Andrew Do for Central Committee 2020" account to the Orange County Republican Party. Less than two weeks later, on September 23, 2020, and as reflected in the second attached 497, the Orange County Republican Party donated nearly the identical amount (\$22,325.98) to Andrew Do's Campaign for Orange County Supervisor. This appears to be thinly veiled attempt to disguise the true source of the donations to Andrew Do's Supervisor account in an effort to skirt Orange County's TIN-CUP ordinance and the campaign contribution limits contained therein, which would apply to Andrew Do's Central Committee account. In short, this was an illegal transfer of funds, with the Orange County Republican Party acting as an intermediary in a money laundering scheme perpetrated by Supervisor Andrew Do.

I am asking that you please immediately open an investigation into this conduct.

497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

NAME OF FILER Andrew Do for Central Committee 2020		Date of This Filing <u>09/11/2020</u>	Date Stamp	<div style="border: 2px solid black; padding: 5px; color: red; font-weight: bold;"> E-Filed 09/11/2020 11:39:05 Filing ID: 192597502 </div>	CALIFORNIA FORM 497 For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) 1383528	Report No. <u>20-4.</u>			
STREET ADDRESS		<input type="checkbox"/> Amendment to Report No. _____ (explain below)			
CITY	STATE	ZIP CODE	No. of Pages <u>1</u>		

2. Contribution(s) Made

DATE MADE	FULL NAME, STREET ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/11/2020	Republican Party of Orange County (ID# 742088)		24,000.00	

Reason for Amendment: _____

Late Contribution Report

Type or print in ink.
Amounts may be rounded to whole dollars.

LATE CONTRIBUTION REPORT

NAME OF FILER Republican Party of Orange County (State Acct.)			Date of This Filing _____ 09/23/2020	Date Stamp Page 2 of 3	CALIFORNIA FORM 497 For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) 742088		Report No. _____ 3632		
STREET ADDRESS			<input type="checkbox"/> Amendment to Report No. _____ (explain below)		
CITY Tustin	STATE CA	ZIP CODE 92780-6298	No. of Pages _____ 3		

Late Contribution(s) Made

DATE MADE	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/22/2020	Andrew Do for Supervisor 2020 Westminster, CA 92683 ID# 1373827	Andrew Do County Supervisor District 1 Jurisdiction: County Orange County	\$2,000.00	11/03/2020
09/22/2020	Andrew Do for Supervisor 2020 Westminster, CA 92683 ID# 1373827	Andrew Do County Supervisor District 1 Jurisdiction: County Orange County	\$20,325.98	11/03/2020

Reason for Amendment:

Memo Reference:

The expenses disclosed on this report are Member Communications.



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

October 2, 2020

Mario Angeles, Jr.

Via email: [REDACTED]

RE: FPPC Case No. 2020-00810; Andrew Do for Supervisor 2020; Republican Party of Orange County

Dear Mr. Angeles:

This letter is to notify you that the Enforcement Division of the Fair Political Practices Commission will investigate the allegation(s), under the jurisdiction of the Commission, of the sworn complaint you submitted in the above-referenced matter. Please note that, while you filed the complaint against the Andrew Do for Supervisor 2020 committee, we have also included the Republican Party of Orange County as part of the investigation.

You will next receive notification from us upon final disposition of the case. However, please be advised that at this time we have not made any determination about the validity of the allegation(s) you have made or about the culpability, if any, of the person(s) you identify in your complaint. Thank you for taking the time to bring this matter to our attention. If you have any questions regarding this letter, please contact Tara Stock at tstock@fppc.ca.gov.

Sincerely,

Galena West, Chief
Enforcement Division

GW:ts

cc: Andrew Do for Supervisor 2020; Lysa Ray, Treasurer
Ashlee Titus o/b/o Republican Party of Orange County



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

October 2, 2020

Ashlee Titus
o/b/o Republican Party of Orange County
Via email: atitus@bmhlaw.com

Re: FPPC Case No. 2020-00810; Andrew Do for Supervisor 2020; Republican Party of Orange County

Dear Ms. Titus:

As you are aware, the Enforcement Division of the Fair Political Practices Commission received a sworn complaint against Andrew Do for Supervisor 2020 alleging potential violations of the campaign disclosure provisions of the Political Reform Act (the “Act”). This letter is to notify you that, as a result of that complaint, the Enforcement Division has commenced a commission-initiated investigation regarding potential violations of the campaign disclosure provisions of the Act by your client, the Republican Party of Orange County.

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. Should you have any comments on this matter, please submit them in writing to Tara Stock at tstock@fppc.ca.gov.

Sincerely,

Galena West
Chief, Enforcement Division

GW/ts