



REC'D JUL 03 2010

FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

June 29, 2010

Mr. Ernest F. Dalidio, Jr.
[REDACTED]

Re: San Luis Obispo Downtown Association, FPPC No. 07/468

Dear Mr. Dalidio:

On July 31, 2007, the Fair Political Practices Commission (the "Commission") received your complaint. The complaint alleged that the San Luis Obispo Downtown Association (SLO-DA) used public funds to engage in political activity in violation of Sections 81002, 84200-84225, and 84301 of the Political Reform Act (the "Act").¹ Specifically, you alleged that the SLO-DA expended significant staff time, effort, and resources in its support and opposition of various ballot measures and initiatives, and that this activity constituted a reportable campaign contribution under the Act.

The Enforcement Division of the Commission has completed its investigation of your allegations, and has concluded that the evidence does not support prosecution of this case because the SLO-DA's political activity did not rise to the threshold required under Regulation 18423 to be considered a contribution. Therefore, we have closed this case.

Sincerely,

A handwritten signature in cursive script that reads "Sukhi K. Brar".

Sukhi K. Brar
Commission Counsel
Enforcement Division

SKB:fp

¹ The Political Reform Act is contained in Government Code section 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

Mr. Ernest F. Dalidio, Jr.

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cc: Michael Pick, Jr.

James McKiernan Lawyers

21 Santa Rosa Street

San Luis Obispo, CA 93405