



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax (916) 322-0886

July 24, 2013

✓ Mark David Osterkamp
Analytic Investors

REDACTED

Re: Advisory Letter
FPPC No. 13/0504

Dear Mr. Osterkamp:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act").¹ This letter is in response to a non-filer referral from the California Secretary of State's Political Reform Division which alleged that you violated the Act's lobbying reporting provisions.

The Enforcement Division of the FPPC reviewed the complaint and has decided to close its file on this matter without initiating an enforcement action. The basis for this decision follows.

The Act requires that lobbying employers like Analytic Investors file a Form 635 quarterly, and include each of their lobbyist's 615 Forms. The Enforcement Division has looked into the matter and determined that as lobbyist, your 615 Forms were not timely filed for the following quarters:

- Quarter 3; due October 31, 2011
- Quarter 5; due April 30, 2012
- Quarter 6; due July 31, 2012

Additionally, the FPPC found that your 615 forms have not been filed for the following quarters:

- Quarter 7; due October 31, 2012
- Quarter 8; due January 31, 2013

Although we have decided not to pursue an enforcement action in this matter, you are advised that your failure to comply with the provisions of the Act in the future could result in an enforcement action. In addition, the information in this case will be retained and may be used against you should an enforcement action become necessary based on future conduct and/or newly discovered information.

The FPPC publishes forms and manuals to facilitate compliance with the disclosure requirements of the Act. If you need forms or manuals, or have questions regarding any of your filing obligations, please call the Technical Assistance Division (866) 275-3772 or visit our website at www.fppc.ca.gov.

Your cooperation in ensuring that the requirements of the Act are consistently satisfied is greatly appreciated. If you have any questions regarding this letter, please feel free to contact Tracey Frazier at (916) 327-2019.

Sincerely,

REDACTED

Gary S. Winuk

Chief, Enforcement Division

cc: Micheal Brogran, Analytic Investors

GW/lf/sf