

# Tracey L. Frazier

Associate | Sacramento

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Tracey Frazier focuses her practice on the complex set of laws and regulations that govern political activity, issue advocacy and government ethics in all 50 states.

Specifically, Tracey's practice includes:

- **Campaign finance and public disclosure.** Tracey advises candidates, committees and contributors on end-to-end campaign finance compliance (from registration and reporting through termination) under federal, state and local rules. She also reviews or structures political communications for compliance with the disclaimer requirements of the FCC, FEC, and state or local regulators; defends against ad challenges; establishes non-profit corporations; and helps clients navigate the rules applicable 501(c)s as they engage in issue advocacy campaigns, legislative lobbying and voter registration or GOTV efforts.
- **Government ethics and lobbying compliance.** Tracey counsels public officials, public agencies and private sector parties on the laws governing conflicts of interest, gifts and honorarium, and revolving-door issues. She also advises lobbyists, lobbying firms and lobbyist employers regarding all aspects of federal, state and local restrictions and prohibitions on their political activities.
- **Enforcement defense and ballot litigation.** Tracey represents clients subject to audits, investigations and administrative enforcement actions brought by the IRS, FEC, FPPC and other state and local regulatory agencies. She also challenges or defends election officials' determinations of ballot placement, ballot arguments and ballot designations on behalf of candidates and ballot measure campaigns.

Prior to joining Nossaman, Tracey spent two years in Washington, D.C., helping build and oversee one of the largest nonfederal campaign finance compliance programs in the nation. There, she worked with a team of lawyers and compliance professionals to advise national nonprofit organizations and Fortune 100 corporations as they established vehicles for multi-jurisdictional engagement (e.g., state or federal hard money or hybrid PACs, independent expenditure organizations or 527s), structured their fundraising strategies and executed their political programs.

Tracey's experience also includes eight years of state-level Executive Branch service – five of which were spent with the Enforcement Division of California's Fair Political Practices Commission. At the FPPC, she helped investigate and prosecute cases involving government ethics, campaign finance and lobbying laws (negotiating over 200 settlements and closing over 1,700 cases) and worked closely with the California Secretary of State's Office as the two agencies implemented new transparency and enforcement programs.

## INSIGHTS

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### PUBLICATIONS

Co-Author, "Individuals Behind LLC Political Contributions to be Disclosed in California Elections ," *Nossaman eAlert*, 07.07.2020

Co-Author, "Natural Disasters During a Global Pandemic – Are You Prepared? ," *Nossaman eAlert*, 06.17.2020

Co-Author, "California's April 1 Deadline to File Statements of Economic Interests Retroactively Extended to June 1, 2020," *Nossaman eAlert*, 04.03.2020

Co-Auhtor, "Happy New Year: Tips for Federal PAC & Lobbying Compliance in the 2020 Election Year," *Nossaman eAlert*, 01.14.2020

### COMMUNITY & PROFESSIONAL

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Council on Governmental Ethics Laws, Member  
California Political Attorneys Association, Member  
Capitol Women's Network, Mentor

### PRACTICES

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Associations, Coalitions & Foundations  
California Advocacy  
Campaign Finance, Election Law & Ethics  
Government Relations & Regulation  
Lobbyist Registration & Reporting

### EDUCATION

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University of the Pacific, McGeorge School of Law, J.D., 2015; *Certificate in Public Law and Policy*  
Loyola Marymount University, B.B.A., 2008

### ADMISSIONS

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California