



**FAIR POLITICAL PRACTICES COMMISSION**

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

May 20, 2015

Camilla H. Fox  
Project Coyote ✓

**Re: Closure Letter; FPPC No. 14-1068**

Dear Ms. Fox:

The Enforcement Division of the Fair Political Practices Commission (Enforcement Division) enforces the provisions of the Political Reform Act (Act).<sup>1</sup> As you may be aware, the Enforcement Division recently opened an investigation into allegations that you qualified as a lobbyist in your role as executive director of Project Coyote and that you violated the Act by failing to register as a lobbyist.

A person qualifies as a lobbyist if he or she: (1) receives \$2,000 or more in any calendar month for engaging in direct communication, other than administrative testimony, with any qualifying official for the purpose of influencing legislative or administrative action, or (2) spends one-third or more of the time, in any calendar month, for which he or she receives compensation from his or her employer, engaged in direct communication, other than administrative testimony, with one more qualifying official for the purpose of influencing legislative or administrative action.<sup>2</sup>

A qualifying official is any elected state official, any legislative official, any appointed, elected, or statutory member or director of any state agency, or any staff member of any state agency who makes direct recommendations to any appointed, elected, or statutory member or director of any state agency, or who has decision-making authority concerning such recommendations.<sup>3</sup>

The Enforcement Division has completed its investigation into the allegations against you and found no evidence that you qualified as a lobbyist. As a result, we are closing this matter.

<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

<sup>2</sup> Cal. Code Regs., tit. 2, § 18239, subds. (b)-(c).

<sup>3</sup> Cal. Code Regs., tit. 2, § 18239, subd. (d)(5).

If you have any questions regarding this matter, please feel free to contact me at 916-327-6357.

Sincerely,

A large black rectangular redaction box covering the signature of Milad Dalju.

Milad Dalju  
Commission Counsel  
Enforcement Division