



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811  
(916) 322-5660 • Fax (916) 322-0886

April 30, 2021

Kimberely Beatty

Via Email: [REDACTED]

**Re: No Action Closure Letter**

**FPPC Case No. 2018-01108;**

**Citizens for Sound Governance at PUSD and Kimberely Beatty**

Dear Ms. Beatty:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").<sup>1</sup> The Enforcement Division received a complaint alleging that you were responsible for paying for and distributing a doorhanger advertisement opposing two candidates in the November 6, 2018 General Election for the Poway Unified School District Board of Directors. Specifically, the allegation was that you had failed to file as a committee and disclose your political activity and/or the political contributions and expenditures of others, in violation of the Act.

After an investigation, the Enforcement Division has determined that there is insufficient evidence that a violation has occurred. In order to fall under the jurisdiction of the Act, the person or persons responsible for the door hanger must qualify as a committee. The threshold for an independent expenditure committee is spending \$1,000 or more in a calendar year. The threshold for a recipient committee is spending \$2,000 or more in a calendar year. There is insufficient evidence that either threshold was met with regard to the door hanger in question. Therefore, we have closed our investigation in this matter.

If you have any questions regarding this matter, please feel free to contact me at 916-323-6421.

Sincerely,

Theresa Gilbertson  
Senior Commission Counsel  
Enforcement Division

CC: Complainants, Kelly Logan, Joe McEachron, Kris Hizal, Naomi Lukaszewski, Patrick Keough, Crystal Ochoa, Stephanie Martin, Greg Strachan, and Peter Califano, care of the Poway Federation of Teachers, AFT Local 2357; T.J. Zane, and Michelle O'Connor-Ratcliff

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<sup>1</sup> The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in §§ 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.