



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

January 18, 2023

Jackie Dilley
Californians for Responsible Government
Estate of Waldon Randall Welty
[REDACTED]

No Action Closure Letter (FPPC Case No. 2018-01486) re: Californians for Responsible Government; Jackie Dilley; and Waldon Randall Welty

Gentlepersons:

The Enforcement Division of the Fair Political Practices Commission (FPPC) enforces the provisions of the Political Reform Act.¹ This case arises from a referral that we received from the San Bernardino City Clerk, which alleged:

There was an issue that arose in San Bernardino just prior to the [November 2018] election that I'd like to report to the Enforcement Division.

The attached document is a flier that was delivered to my mail box (and throughout the city) about October 30, claiming to be paid for by Californians for Responsible Government (FPPC# 1377267). I looked into that and found that that particular campaign was closed some time ago. [The flier was a two-page mailer, urging the recipient to vote no on Measure X, a ballot measure involving regulation of marijuana businesses. In November 2018, the measure passed, garnering more than 60% of the vote.]

Additionally, the return address listed on the flier is 300 N. D Street, the address of San Bernardino City Hall. The city did not mail this out, nor is the group based at City Hall. As you can imagine, the City Manager is apoplectic about this and I told her I would report it.

I'm not sure what you can do, but please consider this a formal complaint from the City Clerk regarding this mailer.

Also, this case is based on a non-filing referral that we received from the Secretary of State regarding the PAC in question. (The referral pertained to reporting periods ending well-after the PAC's termination of April 2018.) I am writing to notify you about the results of our investigation.

Our investigation established that, more likely than not, the mass mailing in question was paid for and sent by the late Waldon Welty. The mailing, and other No on Measure X advertisements that were paid for by Welty, should have been reported by him on the appropriate filings for someone who qualified as an independent expenditure committee (rather than attempting to un-terminate the

¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000 through 91014.

PAC noted above, which officially terminated in April 2018). Since Mr. Welty is deceased, we are closing our case at this time without further action.

Thank you for your attention to this matter. Please do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

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cc: San Bernardino City Clerk
California Secretary of State