



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

January 5, 2023

Daniel Silver
Endangered Habitats League, Inc.
c/o Richard Rios, Esq.
Olson Remcho, LLP
[REDACTED]

Shawnda Deane
Safeguard Our San Diego Countryside, sponsored by environmental and planning organizations
[REDACTED]

Mark Jackson
San Diegans for Managed Growth, Inc.
Protect San Diego County sponsored by environmental and planning organizations
[REDACTED]

Diane Coombs
[REDACTED]

Re: No Action Closure Letter (FPPC Case No. 18/434) - Endangered Habitats League, Inc.; San Diegans for Managed Growth, Inc.; Protect San Diego County sponsored by environmental and planning organizations; Safeguard Our San Diego Countryside, sponsored by environmental and planning organizations; Daniel Silver; Diane Coombs; Mark Jackson; and Shawnda Deane

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 sworn complaint alleging campaign filing/reporting violations with respect to a December 2017 contribution in the amount of \$100,000 made by Endangered Habitats League, Inc. in support of a ballot initiative—that later would be designated as San Diego County Measure A in the election of March 2020.

All required corrective statements/amendments were filed by mid-2018, at the latest—which was more than one-and-a-half years before the relevant election. This was a significant amount of time for the public to receive disclosure before voting. The ballot measure did not pass—so the efforts in support of the initiative were unsuccessful. Also, shortly after Enforcement’s case was opened, the Superior Court of San Diego County approved a legally and factually detailed, stipulated judgment/settlement whereby the respondents/defendants were required to pay \$16,500 for the prevailing party’s costs and attorney fees. (See San Diego County Sup. Ct. Case No. 37-2018-00024907-CU-MC-CTL.) This adjudicated settlement resulted in the corrective filings noted above. Under these circumstances, we are closing this case without further action.

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

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

Very truly yours,

Neal P. Bucknell

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cc: James Sutton, Esq. (sworn complainant)