



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

October 18, 2023

Ashlee Titus
Bell, McAndrews & Hiltachk, LLP
o/b/o Taxpayers and Residents for Preserving the Quality of Life in Newport Beach, supporting
Duffield, Peotter and Muldoon for City Council 2018 and Ken Low
Email: atitus@bmhlaw.com

**No Action Closure Letter Re: FPPC No. 2018-01437: Taxpayers and Residents for
Preserving the Quality of Life in Newport Beach, supporting Duffield, Peotter and
Muldoon for City Council 2018 and Ken Low**

Dear Ashlee Titus:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ This letter is in response to a sworn complaint regarding potential violations of the advertisement disclaimer provisions of the Act, specifically, that the committee, Taxpayers and Residents for Preserving the Quality of Life in Newport Beach, supporting Duffield, Peotter and Muldoon for City Council 2018, sent out mass mailings that failed to accurately disclose its top contributors. We are closing this matter without further action because the allegations have been disproven.

The Enforcement Division's investigation showed that Howard Ahmanson Jr./Fieldstead and Company reached \$50,000 in contributions (the threshold for top contributor disclosure in advertisements) to the Committee on November 5, 2018. The Committee did not disseminate any advertisements on or after November 5, 2018. Additionally, in an abundance of caution, the Committee included Howard Ahmanson Jr./Fieldstead and Company as a top contributor in the final advertisement it disseminated, which occurred on or about October 31, 2018, even though Howard Ahmanson Jr./Fieldstead and Company had not yet met the \$50,000 contribution threshold. Therefore, the Committee did not disseminate any advertisements that required Howard Ahmanson Jr./Fieldstead and Company to be disclosed as a top contributor, and we will close this case without further action.

Should you have any questions regarding this letter, please feel free to contact me at 916-322-5771 or abreron@fppc.ca.gov.

Sincerely,

Angela J. Brereton

Angela J. Brereton
Assistant Chief
Enforcement Division

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in sections 18104 through 18998 of Title 2 of the California Code of Regulations.