



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

June 16, 2023

Katrina Foley
c/o Nicholas Sanders
Sanders Political Law
Via Email: nicholas@sanderspoliticallaw.com

No Action Closure Letter: Katrina Foley; FPPC No. 2018-01091

Dear Nicholas Sanders:

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 our investigation concerning a sworn complaint in connection with the above referenced case, alleging your client, in their capacity as a Costa Mesa City Council Member, violated the Act by failing to disclose a gift of travel on their 2016 Annual Statement of Economic Interests ("SEI"). After conducting our investigation and review of the case, we are closing this matter as to this particular complaint because the allegation has been disproven.²

Our investigation determined that your client's child received a gift of travel³ totaling \$1,250 from the City of Costa Mesa. However, the Enforcement Division determined that, at the time of the gift, your client's child had an established relationship with the City of Costa Mesa as a high school student travelling in connection with a Sister City program. Thus, under Regulation 18943, the gift is not treated as a gift to your client and is not required to be disclosed on your client's SEI. For this reason, we are closing this matter as to this particular complaint without further action.

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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 18109 through 18997 of Title 2 of the California Code of Regulations.

² A streamline stipulation was approved for one count of failing to timely disclose the receipt of a gift on the 2017 Annual SEI and two counts for accepting two gifts which exceeded the applicable annual gift limit.

³ The gift was a partial reimbursement for the cost of travelling to China in connection with a Sister City program provided through a high school.

Should you have any questions regarding this letter, please feel free to contact me at (916) 323-6302 (voicemail) or JRinehart@fppc.ca.gov.

Sincerely,

Jenna C. Rinehart

Jenna C. Rinehart,
Commission Counsel
Enforcement Division

cc: Mary Spadoni

