



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

April 29, 2024

Nathan R. Hardy  
Reed & Davidson, LLP  
o/b/o Alex Villanueva  
Via email: [Nathan@politicallaw.com](mailto:Nathan@politicallaw.com)

William H. Minor  
DLA Piper LLP  
o/b/o iHeartMedia, Inc. and KFI-AM  
Via email: [william.minor@dlapiper.com](mailto:william.minor@dlapiper.com)

**Re: No Action Closure Letter: FPPC Case No. 2022-00260, Alex Villanueva, Villanueva for Los Angeles Sheriff 2022, iHeartMedia, Inc., and KFI-AM**

Dear All,

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act.<sup>1</sup> This letter arises from three sworn complaints alleging that iHeartMedia, Inc. and KFI-AM provided an unreported in-kind contribution in the form of airtime for then-candidate Alex Villanueva. After a review of the available evidence, the Enforcement Division is closing our investigation in this matter due to insufficient evidence of a violation.

The Act broadly defines a contribution to mean a payment, a forgiveness of a loan, a payment of a loan by a third party, or an enforceable promise to make a payment, except to the extent that full and adequate consideration is received or if it is clear from the surrounding circumstances that the payment is not made for political purposes.<sup>2</sup> However, notwithstanding the general definition of contribution, there are situations that are explicitly not contributions. These include, payments made by any broadcasting station that routinely carries news and commentary of general interest, for the cost of covering or carrying a news story, commentary, or editorial.<sup>3</sup>

Alex Villanueva was serving as the Sheriff of Los Angeles County in 2022. Villanueva was also an unsuccessful candidate for Sheriff in the November 8, 2022 General Election for Sheriff. Starting in January 2022, the radio station, KFI-AM, invited Villanueva to appear on an unscripted radio call in program. The program covered topics of general public interest, such as homelessness, illegal drugs, deputy gangs, and more. After a review of the available evidence, there is insufficient

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<sup>1</sup> 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, and all regulatory references are to this source.

<sup>2</sup> Section 82015.

<sup>3</sup> Regulation 18215.

evidence to conclude that the airtime provided to Villanueva qualified as a contribution or as an advertisement for Villanueva's re-election campaign. Therefore, we have closed our investigation in this matter. If you have any questions regarding this matter, please feel free to contact me at (279) 237-5960.

Sincerely,



Theresa Gilbertson  
Senior Commission Counsel  
Enforcement Division

CC: Sworn Complainants, Britta Steinbrenner, Matthew C. Rodriguez, and Eli Vera