



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

July 1, 2025

Lacey Keys
o/b/o Friends of the Huntington Beach Public Library
Via email: lacey@keyslawcorp.com

Warning Letter Re: FPPC No. 2025-00754; Friends of the Huntington Beach Public Library

Dear Lacey Keys:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a sworn complaint you submitted to self-report a violation of the campaign disclosure provisions of the Act on behalf of your client, Friends of the Huntington Beach Public Library. The Enforcement Division has completed its review of the facts in this matter. Specifically, we found that your client made four contributions totaling \$23,070 to Citizens for Good Governance between August 2024 and November 2024, and they failed to timely file a Form 461 semi-annual campaign statement by the January 31, 2025 deadline.

Under the Act, an individual or entity that makes contributions totaling \$10,000 or more in a calendar year qualifies as a major donor committee and incurs filing obligations.² If the \$10,000 threshold is met in the first six months of the calendar year, a major donor committee must file Form 461 covering the period of January 1 through June 30 by July 31 of that calendar year. If the \$10,000 threshold is met in the second six months of the calendar year, a major donor committee must file Form 461 covering the period of July 1 through December 31 by January 31 of the following calendar year.³

Your client violated the Act by failing to file a Form 461 covering the period of January 1, 2024 through December 31, 2024, by the January 31, 2025 deadline. However, the Enforcement Division has decided to close this case with a warning letter rather than a fine for the following reasons: the Form 461 was filed before the applicable election, this appears to be the first time your client qualified as a major donor, the activity was reported by the other participant in the transactions, and your client has no history of violating the Act. Please note that while the

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, and all regulatory references are to this source.

² Section 82013(c).

³ Section 84200(b).

Enforcement Division is closing this matter without a fine, the filing officer, City of Huntington Beach, may assess late filing penalties.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the Enforcement Division will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the Commission's website ten (10) days from the date of this letter.

Please feel free to contact Vanessa Greer at vgreer@fppc.ca.gov or 279-237-5965 with any questions you may have regarding this letter.

Sincerely,

Christopher B. Burton

Christopher B. Burton, Assistant Chief
Enforcement Division

CBB: vg