



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

April 1, 2026

Our Schools USA
Christina Gagnier
Via email: team@ourschoolsusa.org

Kristi Hirst
Via email: legal@ourschoolsusa.org

Re: Advisory Letter re: FPPC 2024-00472; Christina Gagnier, Kristi Hirst, Our Schools USA

Dear all,

The Enforcement Division of the Fair Political Practices Commission (the “Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to sworn complaints alleging that Christina Gagnier, Kristi Hirst, and Our Schools USA caused activity that led to committee qualification, a failure to file campaign statements, and a failure to include a disclaimer on advertisements. The Enforcement Division completed its investigation and review of the case and will close its file.

The Act defines a “committee” as any person or combination of persons who directly or indirectly does any of the following: a) receives contributions totaling \$2,000 or more in a calendar year, b) makes independent expenditures totaling \$1,000 or more in a calendar year, or c) makes contributions totaling \$10,000 or more in a calendar year to or at the behest of candidates or committees.² The Act further defines that certain organizations, including nonprofit organizations such as Our Schools USA, can qualify as a committee under specific circumstances. These organizations, referred to in the Act as multipurpose organizations, can qualify in a number of ways, including by receiving a qualifying amount of donations from donors that were given for or with the understanding that those funds would be used to support or oppose candidates or measures on the ballot.³ In addition, a multipurpose organization can qualify if it spends \$50,000 or more in a calendar year on contributions or expenditures to support or oppose candidates or measures on the ballot.⁴ With respect to certain ballot measures, including recall elections, committees formed to support or oppose the recall of a candidate will

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.

³ Section 84222, subdivision (c)(2-4).

⁴ Section 84222, subdivision (c)(5).

qualify as a committee if they raise or spend \$2,000, and the petition to recall the candidate has begun circulation for signatures or the measure has qualified for the ballot.⁵

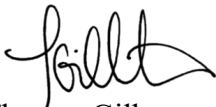
In 2023 and 2024, the Instagram account with the handle “@ourschoolsinlandvalley” posted and shared photographs or informational graphics supporting the recall of Sonia Shaw, a member of the Chino Valley Unified School District. Included in these posts were images of yard signs or posts with the text, “Recall Shaw, protectallourkids.org.” This hyperlink led to a now private, inaccessible website.

To date, there has been no petition to recall Sonia Shaw filed with San Bernardino County, and there were no candidates for the Chino Valley Unified School District on any ballot in 2023 or 2024. Based on this, the Enforcement Division cannot conclude that any of the activity cited in the complaint, including posting in support of a recall of Sonia Shaw, or signs made or printed that supported the recall of Sonia Shaw, could have caused any person or persons to qualify as a committee. Therefore, there is insufficient evidence to support a finding that you violated the Act.

Although we are closing our file, please be advised of the reporting and advertisement disclosure provisions in the Act. A person or persons, including an organization formed for nonpolitical purposes, can qualify as a committee provided that the person or persons receive contributions above the threshold or if the person or persons make reportable expenditures above the threshold. If you need additional guidance, you may contact the Commission’s Advice team by sending an email to advice@fppc.ca.gov. There is also information pertaining to campaign reporting requirements and advertisement disclosure requirements on the Commission’s website at www.fppc.ca.gov. The website includes Campaign Manuals and fact sheets on multipurpose organizations reporting political spending.

Should you have any questions regarding this letter, please feel free to contact me at tgilbertson@fppc.ca.gov or (279) 237-5960.

Sincerely,



Theresa Gilbertson
Attorney Supervisor
Enforcement Division

CC: *Sworn Complainant*

⁵ See 82043, definition of “measure” and Regulation 18531.5.