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BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
STATE OF CALIFORNIA

In the Matter of	)	FPPC No.: 18/976
	)	
KERN NEIGHBORHOODS FOR	)	DEFAULT DECISION AND
RESPONSIBLE REGULATION IN	)	ORDER
SUPPORT OF MEASURE J AND TIM	)	
BLAKELEY,	)	(Government Code Sections 11506
	)	and 11520)
Respondents.	)	

Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby submits this Default Decision and Order for consideration by the Fair Political Practices Commission at its next regularly scheduled meeting.

Pursuant to the California Administrative Procedure Act,<sup>1</sup> Kern Neighborhoods for Responsible Regulation in Support of Measure J (the “Committee”) and Tim Blakeley (“Blakeley”) have been served with all of the documents necessary to conduct an administrative hearing regarding the above-captioned matter, including the following:

1. An Order Finding Probable Cause;
2. An Accusation;
3. A Notice of Defense (Two Copies per Respondent);

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<sup>1</sup> The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code.

1 4. A Statement to Respondent; and

2 5. Copies of Sections 11506, 11507.5, 11507.6 and 11507.7 of the Government Code.

3 Government Code Section 11506 provides that failure of a respondent to file a Notice of Defense  
4 within fifteen days after being served with an Accusation shall constitute a waiver of the respondent's  
5 right to a hearing on the merits of the Accusation. The Statement to Respondent served on the Committee  
6 and Blakeley stated that a Notice of Defense must be filed in order to request a hearing. The Committee  
7 and Blakeley failed to file a Notice of Defense within fifteen days of being served with an Accusation.  
8 Government Code Section 11520 provides that if the respondent fails to file a Notice of Defense, the  
9 Commission may take action, by way of a default, based upon the respondent's express admissions or  
10 upon other evidence and that affidavits may be used as evidence without any notice to the respondent.

11 The Committee and Blakeley violated the Political Reform Act as described in Exhibit 1, which  
12 is attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and  
13 accurate summary of the law and evidence in this matter. This Default Decision and Order is submitted  
14 to the Commission to obtain a final disposition of this matter.

15  
16 Dated: \_\_\_\_\_

\_\_\_\_\_  
17 James M. Lindsay, Chief of Enforcement  
18 Fair Political Practices Commission

19  
20 **ORDER**

21 The Commission issues this Default Decision and Order and imposes a total administrative  
22 penalty of \$29,000 upon Kern Neighborhoods for Responsible Regulation in Support of Measure J and  
23 Tim Blakeley, payable to the "General Fund of the State of California."

24 IT IS SO ORDERED, effective upon execution below by the Chair of the Fair Political Practices  
25 Commission at Sacramento, California.

26  
27 Dated: \_\_\_\_\_

\_\_\_\_\_  
28 Adam Silver, Chair  
Fair Political Practices Commission

## **EXHIBIT 1**

### **INTRODUCTION**

Respondent, Kern Neighborhoods for Responsible Regulation in Support of Measure J (the “Committee”) was a primarily formed ballot measure committee supporting Measure J in 2018. The Committee consisted of a group of activists who supported marijuana-related policy issues in both Kern County and the City of Bakersfield. Measure J was a recreational marijuana ban and medical marijuana regulation and taxation initiative that appeared on the November 6, 2018 General Election ballot in Kern County. Measure J was ultimately unsuccessful.

Respondent, Tim Blakeley (“Blakeley”) was named principal officer of the Committee beginning September 11, 2018<sup>1</sup> until the date of termination. Blakeley was also named as the assistant treasurer. Larry Hiestand (“Hiestand”), who was the identified treasurer on campaign statements, is not a named Respondent here because the evidence shows that Blakeley acted as the treasurer throughout the life of the Committee and signed all campaign statements.

The Political Reform Act (the “Act”)<sup>2</sup> requires recipient committees to timely file preelection and semi-annual campaign statements as well as 24-hour contribution reports. The Act prohibits receiving contributions of \$100 or more in cash and making expenditures of \$100 or more in cash. The Act requires recipient committees to disclose certain information about the campaign’s financial activity and to maintain supporting records for contributions received and expenditures made.

This matter stemmed from an AdWatch submission and a Filing Officer Referral from the Kern County Elections Office.

The Committee and Blakeley failed to timely file a preelection campaign statement, two semi-annual campaign statements, and a 24-hour contribution report. The Committee and Blakeley also received prohibited cash contributions, made prohibited cash expenditures, failed to accurately report all contributions and expenditures, and failed to maintain campaign records.

### **DEFAULT PROCEEDINGS UNDER THE ADMINISTRATIVE PROCEDURE ACT**

When the Commission determines that there is probable cause for believing that the Act has been violated, it may hold a hearing to determine if a violation has occurred.<sup>3</sup> Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure

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<sup>1</sup> Hannah Edwards was named the principal officer of the Committee from August 15, 2018 to September 11, 2018. However, the investigation provided no indication she was involved with the Committee and Blakeley and its decision-making.

<sup>2</sup> The Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission (“Commission”) are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

<sup>3</sup> Section 83116.

Act (the “APA”).<sup>4</sup> A hearing to determine whether the Act has been violated is initiated by the filing of an accusation, which shall be a concise written statement of the charges, specifying the statutes and rules which the respondent is alleged to have violated.<sup>5</sup>

Included among the rights afforded a respondent under the APA, is the right to file the Notice of Defense with the Commission within 15 days after service of the accusation, by which the respondent may (1) request a hearing; (2) object to the accusation on the ground it does not state acts or omissions upon which the agency may proceed; (3) object to the form of the accusation on the ground that it is so indefinite or certain that the respondent cannot identify the transaction or prepare a defense; (4) admit the accusation in whole or in part; (5) present new matter by way of a defense; or (6) object to the accusation on the ground that, under the circumstances, compliance with a Commission regulation would result in a material violation of another department’s regulation affecting substantive rights.<sup>6</sup>

The APA provides that a respondent’s failure to file a Notice of Defense within 15 days after service of an accusation constitutes a waiver of the respondent’s right to a hearing.<sup>7</sup> Moreover, when a respondent fails to file a Notice of Defense, the Commission may take action based on the respondent’s express admissions or upon other evidence and affidavits may be used as evidence without any notice to the respondent.<sup>8</sup>

## **PROCEDURAL REQUIREMENTS AND HISTORY**

### **A. Initiation of the Administrative Action**

The service of the probable cause hearing notice, as required by Section 83115.5, upon the person alleged to have violated starts the administrative action.<sup>9</sup>

A finding of probable cause may not be made by the Commission unless the person alleged to have violated the Act is 1) notified of the violation by service of process or registered mail with return receipt requested; 2) provided with a summary of the evidence; and 3) informed of his or her right to be present in person and represented by counsel at any proceeding of the Commission held for the purpose of considering whether probable cause exists for believing the person violated the Act.<sup>10</sup> Additionally, the required notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office.<sup>11</sup>

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<sup>4</sup> The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

<sup>5</sup> Section 11503.

<sup>6</sup> Section 11506, subd. (a)(1)–(6).

<sup>7</sup> Section 11506, subd. (c).

<sup>8</sup> Section 11520, subd. (a).

<sup>9</sup> Section 91000.5, subd. (a).

<sup>10</sup> Section 83115.5.

<sup>11</sup> Section 83115.5.

No administrative action pursuant to Chapter 3 of the Act alleging a violation of any of the provisions of the Act may be commenced more than five years after the date on which the violation occurred.<sup>12</sup>

Documents supporting the procedural history are included in the attached Certification of Records (“Certification”) filed herewith at Exhibit 1, A-1 through A-17, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against the Committee and Blakeley in this matter by serving them with a Report in Support of a Finding of Probable Cause (the “Report”) (Certification, Exhibit A-1) by certified mail.<sup>13</sup> Blakeley was served with the Report on April 14, 2023, individually and on behalf of the Committee. (Certification, Exhibit A-2.) The administrative action commenced on April 14, 2023, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on the Committee and Blakeley contained a cover letter and a memorandum describing probable cause proceedings, advising that they had 21 days in which to request a probable cause conference and/or to file a written response to the Report. The Committee and Blakeley did not request a probable cause conference or submit a written response to the Report.

#### **B. Ex Parte Request for a Finding of Probable Cause**

Because the Committee and Blakeley failed to request a probable cause conference or submit a written response to the Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on February 8, 2024. (Certification, Exhibit A-3.)

On February 9, 2024, the Hearing Officer, Legal Division, John Feser, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on the Committee and Blakeley. (Certification, Exhibit A-4.)

#### **C. The Issuance and Service of the Accusation**

Under the Act, if the Hearing Officer makes a finding of probable cause, the Enforcement Division must prepare an accusation pursuant to Section 11503 of the APA, and have it served on the persons who are the subject of the probable cause finding.<sup>14</sup>

Section 11503 states:

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<sup>12</sup> Section 91000.5.

<sup>13</sup> Section 83115.5.

<sup>14</sup> Regulation 18361.4, subd. (e).

A hearing to determine whether a right, authority, license, or privilege should be revoked, suspended, limited, or conditioned shall be initiated by filing an accusation or District Statement of Reduction in Force. The accusation or District Statement of Reduction in Force shall be a written statement of charges that shall set forth in ordinary and concise language the acts or omissions with which the respondent is charged, to the end that the respondent will be able to prepare his or her defense. It shall specify the statutes and rules that the respondent is alleged to have violated but shall not consist merely of charges phrased in the language of those statutes and rules. The accusation or District Statement of Reduction in Force shall be verified unless made by a public officer acting in his or her official capacity or by an employee of the agency before which the proceeding is to be held. The verification may be on information and belief.

Upon the filing of the accusation, the agency must 1) serve a copy thereof on the respondent as provided in Section 11505, subdivision (c); 2) include a post card or other form entitled Notice of Defense that, when signed by or on behalf of the respondent and returned to the agency, will acknowledge service of the accusation and constitute a notice of defense under Section 11506; 3) include (i) a statement that respondent may request a hearing by filing a notice of defense as provided in Section 11506 within 15 days after service upon the respondent of the accusation, and that failure to do so will constitute a waiver of the respondent's right to a hearing, and (ii) copies of Sections 11507.5, 11507.6, and 11507.7.<sup>15</sup> The APA also sets forth the language required in the accompanying statement to the respondent.<sup>16</sup>

The Accusation and accompanying information may be sent to the respondent by any means selected by the agency, but no order adversely affecting the rights of the respondent may be made by the agency in any case unless the respondent has been served personally or by registered mail as set forth in the APA.<sup>17</sup>

On April 15, 2024, the Commission's Chief of Enforcement, James Lindsay, issued an Accusation against the Committee and Blakeley. (Certification, Exhibit A-5.) In accordance with Section 11505, the Accusation and accompanying information, consisting of a Statement to Respondent, two copies of a Notice of Defense Form for each respondent, copies of Government Code Sections 11506, 11507.5, 11507.6, and 11507.7, were served upon the Committee and Blakeley by personal service on April 23, 2024. (Certification, Exhibit A-6.)

Along with the Accusation, the Enforcement Division served the Committee and Blakeley with a "Statement to Respondent," which notified them that they could request a hearing on the merits and warned that, unless a Notice of Defense was filed within 15 days of service of the Accusation, they would be deemed to have waived the right to a hearing. The Committee and Blakeley did not file a Notice of Defense within the statutory time period, which ended on May 7, 2024.

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<sup>15</sup> Section 11505, subd. (a).

<sup>16</sup> Section 11505, subd. (b).

<sup>17</sup> Section 11505, subd. (c).

As a result, on August 1, 2024, the Enforcement Division sent a letter to the Committee and Blakeley advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for September 19, 2024. (Certification, Exhibit A-16)

On September 5, 2024, the Enforcement Division sent another letter to the Committee and Blakeley advising that this matter would be submitted for a Default Decision and Order at the Commission’s public meeting scheduled for September 19, 2024. (Certification, Exhibit A-17.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

## SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred in 2018. For this reason, all legal references and discussions of law pertain to the Act’s provisions as they existed at that time.

An express purpose of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring all committees to disclose all contributions and expenditures made throughout a campaign.<sup>18</sup> Along these lines, the Act includes a comprehensive campaign reporting system.<sup>19</sup>

The Act defines “committee” as any person or combination of persons who receives contributions totaling \$2,000 or more in a calendar year,<sup>20</sup> commonly known as a “recipient committee.” A “primarily formed committee” means a recipient committee which is formed or exists primarily to support or oppose any of the following: a single candidate; a single measure; a group of specific candidates being voted upon in the same city, county, or multicounty election; or two or more measures being voted upon in the same city, county, multicounty, or state election.<sup>21</sup>

The Act requires committees and treasurers to file campaign statements and reports at specific times disclosing information regarding contributions received and expenditures made by the campaign committees.<sup>22</sup> Primarily formed committees to support or oppose a measure appearing on the ballot to be voted on at the next election shall file preelection campaign statements.<sup>23</sup> The first preelection campaign statement, for the period ending in 45 days before the election, shall be filed no later than 40 days before the election.<sup>24</sup> Committees must file a second preelection statement for the reporting period ending 17 days before the election no later than 12 days before the election.<sup>25</sup> If the person has not previously filed a campaign statement, the period covered begins on January 1.<sup>26</sup>

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<sup>18</sup> Section 81002, subd. (a).

<sup>19</sup> Section 84200, *et seq.*

<sup>20</sup> Section 82013, subd. (a).

<sup>21</sup> Section 82047.5.

<sup>22</sup> See Section 84200, *et seq.*

<sup>23</sup> Section 84200.5, subd. (a).

<sup>24</sup> Section 84200.8, subd. (a).

<sup>25</sup> Section 84200.8, subd. (b).

<sup>26</sup> Section 84206, subd. (b).

For the November 6, 2018 General Election, committees were required to file the first preelection campaign statement for the period of July 1, 2018 to September 22, 2018, no later than September 27, 2018. Committees were required to file the second preelection campaign statement for the period September 23, 2018 to October 20, 2018, no later than October 25, 2018.

A committee must file semi-annual campaign statements beginning in the period in which the committee qualified and continuing until the committee terminates.<sup>27</sup> A committee must file a semi-annual statement by January 31 for the period ending December 31 of the previous year, and by July 31 for the period ending June 30.<sup>28</sup> Whenever the deadline falls on a Saturday, Sunday or official state holiday, the filing deadline for a statement shall be extended to the next regular business day.<sup>29</sup> This extension does not apply to 24-hour contribution reports when the due date for these reports falls on a Saturday, Sunday, or official state holiday immediately prior to an election.<sup>30</sup>

Under the Act, a “late contribution” includes a contribution that totals in the aggregate \$1,000 or more and is made to or received by a candidate, a controlled committee, or a committee formed or existing primarily to support or oppose a candidate or measure during the 90-day period preceding the date of the election, or on the date of the election, at which the candidate or measure is to be voted on.<sup>31</sup> Each candidate or committee that makes or receives a late contribution shall report the late contribution within 24 hours of the time it is made or received.<sup>32</sup>

The Act requires committees to report on campaign statements the following information about a person who makes, in the aggregate, contributions of \$100 or more: (1) full name; (2) street address; (3) occupation; (4) employer, or if self-employed, the name of the contributor’s business; (5) the date and amount of each contribution received from the contributor during the reporting period; and (6) the cumulative amount of contributions received from the contributor.<sup>33</sup>

It is the duty of each committee treasurer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements and to establish that campaign statements were properly filed.<sup>34</sup> This duty includes the maintenance of detailed information and original source documentation for a period of four years following the date the campaign statement to which they relate is filed.<sup>35</sup> Examples of original source documentation that must be maintained include copies of bills, receipts, and invoices for expenditures of \$25 or more.<sup>36</sup>

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<sup>27</sup> Section 84200, subd. (a).

<sup>28</sup> Section 84200.

<sup>29</sup> Regulation 18116, subd. (a).

<sup>30</sup> Regulation 18116, subd. (b).

<sup>31</sup> Section 82036, subd. (a).

<sup>32</sup> Section 84203.

<sup>33</sup> Section 84211, subd. (f).

<sup>34</sup> Section 84104.

<sup>35</sup> Regulation 18401, subd. (b)(2).

<sup>36</sup> Regulation 18401, subd. (a)(4).



No contribution of \$100 or more may be made or received in cash.<sup>37</sup> All contributions of \$100 or more must be made in the form of a written instrument containing the name of the contributor and the name of the payee and drawn from the account of the contributor.<sup>38</sup> The Act further prohibits making an expenditure of \$100 or more in cash.<sup>39</sup> The Act defines “expenditure: as a payment, forgiveness of a loan, payment of a loan by a third party, or an enforceable promise to make payment, unless it is clear from the surrounding circumstances that it is not made for political purposes.<sup>40</sup>

Every committee must have a treasurer.<sup>41</sup> Committees must also identify a principal officer.<sup>42</sup> This individual is primarily responsible for approving the committee's political activities, including, but not limited to, authorizing the content of communications, authorizing expenditures, including contributions, on behalf of the committee, and determining the committee’s campaign strategy.<sup>43</sup> It is the duty of the treasurer and the principal officer to ensure the committee complies with all the requirements of the Act.<sup>44</sup>

The treasurer may designate one assistant treasurer on the committee's statement of organization. The assistant treasurer may sign and verify campaign statements on behalf of the committee which the assistant treasurer has used reasonable diligence to prepare and review, and signs to that effect under penalty of perjury as required by Government Code section 81004.<sup>45</sup>

For campaign reporting/filing obligations, the treasurer and the principal officer are liable, along with the committee, for violations of the Act.<sup>46</sup> If two or more persons are responsible for any violation, they shall be held jointly and severally liable.<sup>47</sup> With respect to statements signed by the assistant treasurer, the treasurer and assistant treasurer shall be jointly and severally liable for any violations for which the Political Reform Act would otherwise hold the treasurer liable.<sup>48</sup>

## SUMMARY OF THE EVIDENCE

The Committee and Blakeley filed its initial Form 410 with SOS on September 19, 2018 identifying as a primarily formed ballot measure committee in support of Measure J with a date of qualification of April 16, 2018. (Certification, Exhibit A-7.)

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<sup>37</sup> Section 84300, subd. (a).

<sup>38</sup> Section 84300, subd. (c).

<sup>39</sup> Section 84300, subd. (b).

<sup>40</sup> Section 82025.

<sup>41</sup> Section 84100.

<sup>42</sup> Section 84102, subd. (c).

<sup>43</sup> Section 82047.6.

<sup>44</sup> Sections 81004, 84100, 84104, and 84213, and Regulation 18427.

<sup>45</sup> Regulation 18426.1.

<sup>46</sup> Section 83116.5 and Regulation 18316.6.

<sup>47</sup> Sections 83116.5 and 91006.

<sup>48</sup> *Ibid.*

### Failure to Timely File Campaign Statements

On October 5, 2018, the Enforcement Division received a filing officer referral for the Committee's failure to file the preelection campaign statement for the reporting period of July 1, 2018 through September 22, 2018 by the September 27, 2018 due date. After the Enforcement Division contacted the Committee and Blakeley, the Committee and Blakeley filed a campaign statement for the reporting period of January 1, 2018 through September 22, 2018. (Certification, Exhibit A-8.) Based on the reported date of qualification as well as contributions the Committee reported as early as April 16, 2018, the Committee and Blakeley were required to file a semi-annual campaign statement for the reporting period of January 1, 2018 through June 30, 2018 by July 31, 2018 and a separate preelection campaign statement for the reporting period of July 1, 2018 through September 22, 2018. The Committee and Blakeley timely filed the second preelection campaign statement for the reporting period of September 23, 2018 through October 10, 2018 on October 23, 2018. (Certification, Exhibit A-9.)

The Committee and Blakeley filed a termination semi-annual campaign statement for the reporting period of October 21, 2018 through January 31, 2019 on February 14, 2019, with a termination date of November 13, 2018. (Certification, Exhibit A-10.) This statement should have covered the period of October 21, 2018 through November 13, 2018 and was due no later than January 31, 2019. No activity was reported. The following is a summary of the Committee's late and missing filings:

Type	Period Covered	Date Filed	Due	Days Late
Semi-Annual	1/1/18 to 6/30/18 <sup>49</sup>	10/11/18	7/31/18	72
1 <sup>st</sup> Preelection	7/1/18 to 9/22/18 <sup>50</sup>	10/11/18	9/27/18	15
Semi-Annual	10/21/18 to 12/31/18 <sup>51</sup>	2/14/19	1/31/19	14

### Failure to Timely File 24-Hour Contribution Report

On the second preelection campaign statement, the Committee and Blakeley reported a contribution in the amount of \$1,217 from Vape and Bake received on October 17, 2018. (Certification, Exhibit A-11.) Since the contribution was over \$1,000, it required a 24-hour contribution report to be filed by October 18, 2018. According to filing officer records in Kern County, the Committee and Blakeley failed to timely file the required 24-hour contribution report.

### Failure to Report Contributor Information

On the campaign statement for the reporting period of January 1, 2018 through September 22, 2018, the Committee and Blakeley reported several contributions over \$1,000. The contributions ranged from \$2,000 to \$83,120. (Certification, Exhibit A-12.) In the "date received"

<sup>49</sup> The semi-annual and 1st pre-election reporting periods were combined into one statement filed on October 11, 2018.

<sup>50</sup> The semi-annual and 1st pre-election reporting periods were combined into one statement filed on October 11, 2018.

<sup>51</sup> The filed statement covered a broader reporting period of October 21, 2018 through January 31, 2019.

section of Schedule A of that campaign statement, the Committee and Blakeley cited date ranges for the contributions, instead of the specific date each contribution was made and the cumulative total from the contributor. The Enforcement Division was unable to determine how many times a single contributor donated to the Committee, how much was donated on each occasion, and on what dates. Therefore, the Committee and Blakeley failed to timely report all contributor information. This incomplete reporting prevented the Enforcement Division from determining if additional 24-hour contribution reports were required, as some contributions were lumped together through the 90-day period.

#### Failure to Maintain Adequate Campaign Records

Adequate records were not maintained for all reported contributions totaling \$203,287 and expenditures totaling \$202,342. On February 6, 2019, the Enforcement Division requested all committee records, including but not limited to bank statements, copies of contributor checks, deposit slips, and all invoices. Responsive materials to the records request failed to substantiate campaign activity.

In an interview with FPPC Special Investigator Kaitlin Osborn, Hiestand was asked whether he maintained any of the Committee records. Hiestand stated he did not have any records for the Committee. All campaign statements reflect that Blakeley, the assistant treasurer, signed all campaign statements.

Blakeley, during his recorded interview with Osborn on September 15, 2022, was asked to provide records for the Committee. He stated he maintained some records in 2018, which he kept in a record book. When the Enforcement Division requested records on February 6, 2019, Blakeley was unable to locate the record book. However, since then, he was able to locate it.

Blakeley provided Osborn with photos of an incomplete cash ledger after the recorded interview. (Certification, Exhibit A-13.) The cash ledger consisted of pages titled “KCPR<sup>52</sup> spreadsheet,” “Cash Receipts Paid to Coordinators” and “Cash Out Receipt Banked.” The first two pages also had a column titled “\$ for Signatures” with a list of names and local dispensaries under it. The third page, “Cash Out Receipt Banked” had a similar column titled “\$ for association.”

The book contained some information on advertising expenses and other hand-written notations pertaining to the financial activity of the Committee. The cash ledger pages also contained notes in the margins with what appeared to be totals. The totals listed, however, did not match the amounts listed on other pages. No additional invoices, receipts, or records were produced to support the Committee’s contributions or expenditures.

During the interview, records related to any advertisements produced by the Committee in support of Measure J were also requested. According to Blakeley, some advertising was paid for directly by various collectives as non-monetary contributions. Other than the cash ledger, no

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<sup>52</sup> Kern Citizens for Patient Rights (“KCPR”) was a spin-off case related to this matter. In re the Matter of Kern Citizens for Patient Rights, Larry Heistand and Jeff Jarvis, FPPC Case No 2023-00819, was approved by the Commission on January 18, 2024.

additional invoices, receipts, or records were produced to support these payments or confirm details about any advertisements.

In summary, the records Blakeley provided failed to substantiate the campaign statements and their accuracy. The cash ledger photos and the campaign bank account statements do not provide a clear record of contributions received and expenditures made by the Committee.

#### Improper Cash Contributions and Expenditures

The Committee and Blakeley reported receiving contributions and expenditures totaling \$202,342 in cash. (Certification, Exhibit A-14.).

On March 18, 2019, a subpoena was issued to the Committee's campaign bank account requesting relevant records for the reporting period of January 1, 2018 through December 31, 2018. Responsive materials to the subpoena revealed only three transactions through the campaign bank account, as detailed subsequently.

A review of the bank account confirmed that contributions were not deposited. The bank account showed three transactions. On October 15, 2018, two deposits were made at Family Dollar, the first for \$400 and the second for \$300. On October 16, 2018, a transaction was made to Intermarket Manufacturer for \$608.

During the recorded interview with Osborn, Blakeley stated he collected contributions by going to various dispensary locations in person to collect envelopes of money. The envelopes contained cash contributions. When asked approximately how much cash was collected Blakeley explained it was "quite a bit, thousands and thousands, tens of thousands." Blakeley summarized that it was "a lot of money over a lot of time." Blakeley stated once he received the cash, he did not deposit it into the bank account for the Committee.

After the cash contributions were picked up, Blakeley stated the cash was brought directly to Phillip Ganong's ("Ganong") law office. Blakeley stated that Ganong then distributed the cash at his law office and most of the cash, if not all, was used for signature canvassers.

Blakeley stated he had no documents, other than the cash ledger, to document how the cash was spent. Blakeley stated Mike Myers ("Myers") received some of the cash envelopes directly but other than Myers, he never physically saw where the money went after it was dropped off at Ganong's law office. It was reported on the Committee's campaign statement covering the period of January 1, 2018 to September 22, 2018<sup>53</sup> that Myers received \$189,211 under the code "PET" for petition circulating. (Certification, Exhibit A-15.) However, this reporting could not be verified given the lack of records and use of cash.

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<sup>53</sup> This campaign statement should have covered the first preelection period, covering July 1, 201 through September 22, 2018.

## Summary of Contact

Overall, the Enforcement Division contacted the Committee and Blakeley fifteen times throughout this case, as follows:

- October 5, 2018: Emails from the Enforcement Division regarding past due campaign statement
- October 5, 2018: Phone call with Blakeley regarding past due campaign statement
- October 9, 2018: Follow up email from the Enforcement Division regarding past due campaign statement
- October 9, 2018: Phone call with Blakeley regarding past due campaign statement
- October 11, 2018: Email from Blakeley with copy of past due campaign statement
- July 15, 2022: Email to Blakeley regarding investigation
- August 03, 2022: Phone call to Blakeley
- September 14, 2022: Phone call to Blakeley
- September 15, 2022: Letter mailed to Blakeley
- September 15, 2022: Phone call with Blakeley
- April 14, 2023: Report in Support of Probable Cause served on the Committee and Blakeley
- February 8, 2023: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served mailed to the Committee and Blakeley
- April 23, 2024: Accusation served on the Committee and Blakeley
- August 1, 2024: letter to the Committee and Blakeley informing them that a Default Decision and Order would appear on the agenda for the August 15, 2024 Commission meeting as a notice item
- August 29, 2024 Notice of Intent to Enter Default Decision and Order to the Committee and Blakeley informing them that the Default Decision and Order would be presented at the September 19, 2024 meeting for Commission action

## **VIOLATIONS**

The Committee and Blakeley committed eight violations of the Act as follows:

### COUNT 1

#### **Failure to Timely File a Semi-Annual Campaign Statements**

The Committee and Blakeley had a duty to timely file semi-annual campaign statements for the reporting periods of January 1, 2018 through June 30, 2018 by the July 31, 2018 due date, and October 1, 2018 through December 31, 2018 by the January 31, 2019 due date. By failing to timely file the semi-annual campaign statements, the Committee and Blakeley violated Government Code Section 84200, subdivision (a).

### COUNT 2

### **Failure to Timely File a Preelection Campaign Statement**

The Committee and Blakeley had a duty to timely file a preelection campaign statement for the reporting period of July 1, 2018 through September 22, 2018 by the September 27, 2018 due date. By failing to timely file the preelection campaign statement, the Committee and Blakeley violated Government Code Sections 84200.5, subdivision (a) and 84200.8, subdivision (b).

#### COUNT 3

### **Failure to Timely File a 24-Hour Contribution Report**

The Committee and Blakeley had a duty to timely file a 24-hour contribution report for a \$1,217 contribution received on October 17, 2018, due on October 18, 2018. By failing to timely file the 24-hour contribution report, the Committee and Blakeley violated Government Code Section 84203.

#### COUNT 4

### **Failure to Accurately Report Contributions**

The Committee and Blakeley had a duty to accurately report the date contributions were received on campaign statements for the reporting periods of January 1, 2018 through September 22, 2018 and September 23, 2018 through October 20, 2018. By failing to report the date of each contribution, the Committee and Blakeley violated Government Code Section 84211, subdivision (f).

#### COUNT 5

### **Failure to Keep Accurate Records**

The Committee and Blakeley had a duty to maintain detailed campaign records for contributions received and expenditures made during the stated reporting period of January 1, 2018 through September 22, 2018. By failing to maintain detailed campaign records for contributions received and expenditures made, the Committee and Blakeley violated Government Code Section 84104.

#### COUNT 6

### **Failure to Keep Accurate Records**

The Committee and Blakeley had a duty to maintain detailed campaign records for contributions received and expenditures made during the reporting period of September 23, 2018 through October 20, 2018. By failing to maintain detailed campaign records for contributions received and expenditures made, the Committee and Blakeley violated Government Code Section

84104.

COUNT 7

**Improper Cash Contributions of \$100 or More**

The Committee and Blakeley received cash contributions of \$100 or more during the reporting periods of January 1, 2018 through September 22, 2018 and September 23, 2018 through October 20, 2018. By receiving cash contributions of \$100 or more, the Committee and Blakeley violated Government Code Section 84300, subdivision (a).

COUNT 8

**Improper Cash Expenditures of \$100 or More**

The Committee and Blakeley made cash expenditures of \$100 or more during the reporting periods of January 1, 2018 through September 22, 2018 and September 23, 2018 through October 20, 2018. By making cash expenditures of \$100 or more, the Committee and Blakeley violated Government Code Section 84300, subdivision (b).

**CONCLUSION**

This matter consists of 8 counts of violating the Act, which carry a maximum total administrative penalty of \$40,000.<sup>54</sup>

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division considers the facts and circumstances of the violation in the context of the following factors set forth in Regulation 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the specific violation; (2) The level of experience of the violator with the requirements of the Political Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.<sup>55</sup>

A central purpose of the Act is to ensure receipts and expenditures in election campaigns are fully and truthfully disclosed. The violations here include the failure to timely file campaign statements

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<sup>54</sup> Section 83116, subd. (c).

<sup>55</sup> Regulation 18361.5, subd. (e).

and reports, failure to accurately report contributions, failure to maintain adequate campaign records, and the use of cash contributions and expenditures.

The Committee's failure to timely file campaign statements, particularly the preelection campaign statements and the 24-hour report, deprived the public of important time-sensitive information regarding the Committee's activity prior to the election. Additionally, the failure of the Committee to accurately report contributions deprived the public of important information regarding the date of all contributions and how many times a contributor gave money to the Committee. Therefore the campaign statements were inaccurate and incomplete.

One essential purpose of the recordkeeping provision is to establish that campaign statements were properly filed and contributions and expenditures were properly reported. This violation is considered more serious when the failure to maintain campaign records inhibits investigative efforts. Here, the Committee failed to maintain detailed campaign records for approximately 100% of all contributions and expenditures made. The records Blakeley provided failed to substantiate the campaign statements and their accuracy. The cash ledger photos and the campaign bank statements provided by Blakeley do not provide a clear record of contributions received and expenditures made by the Committee.

Cash transactions make it difficult for the public to track and verify the contributions and expenditures of a committee. Additionally, acceptance of cash contributions of \$100 or more, harms the public because when sources of contributions cannot be verified, and are not disclosed in a timely manner, the public's ability to determine the full extent of a committee's campaign activity and make an informed voting decision is hindered by a lack of transparency. Here, the Committee's use of cash for 100% of its contributions and expenditures made it impossible to track and verify all contributions and expenditures. Additionally, the Committee failed to timely file all campaign statements which created a lack of transparency.

Ultimately, the lack of records and the use of cash also prohibited the Enforcement Division from determining other violations of the Act, including, but not limited to, failure to accurately report contributions, expenditures, and sub-vendor information, failure to timely file additional 24-hour contribution reports, advertisements disclosure violations, money laundering and misuse of campaign funds.

Blakeley has little experience to no experience with the Act. Blakeley has never been a treasurer prior to this case and is not a professional treasurer. The Enforcement Division found no evidence Blakeley intended to deceive or mislead the public. Instead, the violations appear to be the result of negligence and the Respondents' inexperience with the Act. However, Blakeley did not consult with the Commission staff or any other governmental agency regarding the Committee's filing obligations. Blakeley has no prior record of violations, and he cooperated with the Enforcement Division's investigation. Blakeley's inexperience and negligence resulted in serious errors, and the failure of the Committee to maintain sufficient campaign records made it impossible for it to file corrective amendments.

The Enforcement Division also considers previous cases approved by the Commission in determining penalties. In this matter, the following cases were used as guidelines.



### Count 1

- *In the Matter of Wyman for Attorney General 2014 and James M. O’Hearn*, FPPC No. 17/378. (The Commission approved a default decision on April 16, 2020). The respondent, among other violations, failed to file two semi-annual campaign statements. The Commission imposed a penalty of \$4,000 for this violation.
  - A lower penalty of \$3,000 is recommended for this count because, unlike in Wyman, where the reports were never filed, here, the activity was disclosed and reported prior to the relevant election. However, each statement filed here covered more than the required reporting period and consequently were filed late.

### Count 2

- *In the Matter of Corso for Council 2014, Taxpayers for Oceanside Neighborhoods, and Dana Corso*, FPPC No. 15/245. (The Commission approved a default decision on April 16, 2020.) The respondents, among other violations, failed to timely file a preelection campaign statement. The Commission imposed a penalty of \$2,000 for this violation. A similar penalty is recommended here.

### Count 3

- *In the Matter of Santa Ana Committee for Safe Neighborhoods and Safe Access Supporting Measure BB and Opposing Measure CC and Van Ton*, FPPC No. 15/1004. (The Commission approved a default decision on June 13, 2019.) The respondents, among other violations, failed to timely file a 24-hour contribution report. The Commission imposed a penalty of \$3,000 for this violation. A similar penalty is recommended here.

### Count 4

- *In the Matter of Eric Payne and Eric Payne for SCCCD 2015 Trustee Area 2*, FPPC No. 16/19917. (The Commission approved a default decision on June 13, 2019.) The respondents, among other violations, failed to accurately report all contributions received and expenditures made. They underreported and overreported contributions and expenditures by almost \$8,000 across three reporting periods and failed to report occupation and/or employer information for several contributors and street addresses for several payees. The Commission imposed a penalty of \$1,000 for this violation.
  - A higher penalty of \$4,000 is recommended for this count because the Committee reported date ranges for all contributions instead of the date each contribution was received. Additionally, the Committee did not report the cumulative year-to-date amount of contributions per contributor. This incomplete reporting made it impossible to confirm how many times a contributor made a contribution, on what day and for how much. In aggravation, the reporting additionally prevented the Enforcement Division from determining if any additional 24-hour reports were required.

Counts 5-6

- *In the Matter Committee to Clean House and Kevin McVey*, FPPC No. 15/2202. (The Commission approved a default decision on March 21, 2019.) The respondents, among other violations, failed to maintain records for 100 percent of its contributions received, amounting to \$10,486.50, and for about 93 percent of expenditures made, amounting to \$7,836 during two reporting periods. The Committee accepted all its contributions and made all its expenditures in cash. The Commission imposed a penalty of \$3,000 for this violation.
  - A higher penalty of \$4,500 is recommended for each count because the amount of contributions and expenditures for which the Committee failed to maintain records is significantly higher in this case than in the comparable case. Here, the Committee failed to maintain adequate records for 100 percent of its contributions and expenditures, totaling over \$200,000. Additionally, in aggravation, all contributions and expenditures were made in cash, and the lack of records prevented the Enforcement Division from discovering additional violations.

Counts 7-8

- *In the Matter Committee to Clean House and Kevin McVey*, FPPC No. 15/2202. (The Commission approved a default decision on March 21, 2019.) The respondents, among other violations, accepted all \$10,486 of contributions in cash, including five over \$100. They also made their expenditures in cash, including at least three over \$100. The Commission imposed a penalty of \$2,500 for this violation.
  - A higher penalty of \$4,000 is recommended for each count because the amount of cash received in cash and expenditures made in cash here is significantly higher than in the comparable case and 100 percent of the Committee’s contributions and expenditures were made in cash. Additionally, in aggravation, cash and the lack of recordkeeping prevented the Enforcement Division from identifying additional violations.

**PROPOSED PENALTY**

After considering the factors of Regulation 18361.5 and the penalties imposed in prior cases, the following penalties are proposed:

<b>Counts</b>	<b>Violations: The Committee and Blakeley</b>	<b>Proposed Penalty per Count</b>
1	Failure to Timely File Semi-Annual Campaign Statements	\$3,000
2	Failure to Timely File Preelection Campaign Statement	\$2,000
3	Failure to Timely File 24-Hour Contribution Report	\$3,000
4	Failure to Accurately Report Contributions	\$4,000
5	Failure to Keep Accurate Records	\$4,500

6	Failure to Keep Accurate Records	\$4,500
7	Improper Cash Contributions and Expenditures	\$4,000
8	Improper Cash Contributions and Expenditures	\$4,000
	<b>Total:</b>	<b>\$29,000</b>



**DECLARATION OF CUSTODIAN OF RECORDS  
CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION  
Enforcement Division**

**CERTIFICATION OF RECORDS**

The undersigned declares and certifies as follows:

1. I am employed as an Associate Governmental Program Analyst by the California Fair Political Practices Commission (Commission). My business address is: California Fair Political Practices Commission, 1102 Q St, Ste 3050, Sacramento, CA 95811.
2. I am a duly authorized custodian of the records maintained by the Commission in the Enforcement Division. As such, I am authorized to certify copies of those records as being true and correct copies of the original business records which are in the custody of the Commission.
3. I have reviewed documents maintained in *FPPC Case No. 18/976; Kern Neighborhoods for Responsible Regulation in Support of Measure J and Tim Blakeley* and have caused copies to be made of documents contained therein. I certify that the copies attached hereto are true and correct copies of the documents prepared in the normal course of business and which are contained in files maintained by the Commission. The attached documents are as follows:

EXHIBIT A-1: Report in Support of a Finding of Probable Cause, dated April 12, 2023

EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated April 14, 2023,

EXHIBIT A-3: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated February 8, 2024

EXHIBIT A-4: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated February 9, 2024

EXHIBIT A-5: Accusation, dated April 15, 2024

- EXHIBIT A-6: Proof of Service on April 23, 2024, for Accusation and accompanying documents from process server, dated April 23, 2024
- EXHIBIT A-7: Initial statement of organization, filed on September 19, 2018
- EXHIBIT A-8: Campaign statement for the reporting period of January 1, 2018 through September 22, 2018, filed on October 11, 2018
- EXHIBIT A-9: Campaign statement for the reporting period of September 23, 2018 through October 20, 2018, filed on October 23, 2018
- EXHIBIT A-10: Campaign statement for the reporting period of October 21, 2018 through January 31, 2019, filed February 14, 2019
- EXHIBIT A-11: Schedule E of campaign statement, filed on October 23, 2018
- EXHIBIT A-12: Schedule A of campaign statement, filed on October 11, 2018
- EXHIBIT A-13: Pages from handwritten record book
- EXHIBIT A-14: Summary pages from campaign statements filed on October 11, 2018 and October 23, 2018
- EXHIBIT A-15: Schedule E of campaign statement, filed on October 11, 2018
- EXHIBIT A-16: Notice of Default Decision and Order, dated August 1, 2024.
- EXHIBIT A-17: Notice of Intent to Enter Default Decision and Order, dated August 29, 2024.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 29, 2024, at Sacramento, California.



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Shaina Elkin  
Associate Governmental Program Analyst  
Enforcement Division  
Fair Political Practices Commission

**Exhibit A-1**

1 CHRISTOPHER B. BURTON

Acting Chief of Enforcement

2 MARISSA NASH

Commission Counsel

3 **FAIR POLITICAL PRACTICES COMMISSION**

1102 Q Street, Suite 3000

Sacramento, CA 95811

4 Telephone: (916) 522-3772

5 Email: MNash@fppc.ca.gov

6 Attorneys for Complainant

Enforcement Division of the Fair Political Practices Commission

7  
8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

9 **STATE OF CALIFORNIA**

10 In the Matter of

) FPPC No. 18/976

)

) **REPORT IN SUPPORT OF A FINDING OF**  
) **PROBABLE CAUSE**

)

11 KERN CITIZENS FOR PATIENT  
12 RIGHTS, KERN NEIGHBORHOODS  
13 FOR RESPONSIBLE REGULATION IN  
14 SUPPORT OF MEASURE J, LARRY  
15 HIESTAND, TIM BLAKELEY, AND  
16 JEFF JARVIS

) Conference Date: TBA

) Conference Time: TBA

) Conference Location: Commission Offices  
1102 Q Street, Suite 3000  
Sacramento, CA 95811

)

)

17 Respondents.

)

18 **INTRODUCTION**

19 Respondent, Kern Citizens for Patient Rights (“KCPR”), was a general purpose ballot measure  
20 committee “formed to support measures for patient rights and oppose those that are not for patient  
21 rights.” In 2016, KCPR was the principal committee supporting Measure O and Measure J.

22 Respondent, Kern Neighborhoods for Responsible Regulation in Support of Measure J (“Kern  
23 Neighborhoods”), was at the relevant times a primarily formed ballot measure committee supporting  
24 Measure J.  
25

1 Measure O was a City of Bakersfield, California initiative asking voters whether Bakersfield  
2 should allow and regulate commercial medicinal cannabis. Measure O appeared on the November 6,  
3 2018 General Election Ballot in the City of Bakersfield, and was ultimately unsuccessful. Measure J  
4 was a recreational marijuana ban and medical marijuana regulation and taxation initiative that also  
5 appeared on the November 6, 2018 General Election ballot in Kern County and was unsuccessful.

6 Respondent, Larry Hiestand (“Hiestand”) was named the treasurer of both Kern Neighborhoods  
7 and KCPR during the relevant time periods. Respondent Jeff Jarvis (“Jarvis”) was a named principal  
8 officer of KCPR.

9 Respondent, Tim Blakeley (“Blakeley”), was named principal officer of Kern Neighborhoods  
10 beginning September 11, 2018<sup>1</sup> until the date of termination and was the assistant treasurer throughout  
11 the lifetime of Kern Neighborhoods. Although Blakeley was named the assistant treasurer, he acted as  
12 the treasurer throughout the life of the Kern Neighborhoods committee and signed all campaign  
13 statements filed by Kern Neighborhoods.

14 Respondents, KCPR, Hiestand, and Jarvis committed numerous violations of the Political  
15 Reform Act (the “Act”)<sup>2</sup>, including failure to timely file pre-election and semiannual campaign  
16 statements and improper cash contributions.

17 Respondents Kern Neighborhoods, Hiestand, Edwards, and Blakeley committed numerous  
18 violations of the Act, including failure to timely file pre-election and semiannual campaign statements,  
19 failure to timely file a 24-hour contribution report, failure to report contributor information, violations  
20 of the Act’s recordkeeping requirements, and improper cash contributions and expenditures.

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24 <sup>1</sup> Hannah Edwards was named the principal officer of Kern Neighborhoods from August 15, 2018 to September 11,  
25 2018. However, the investigation provided no indication she was involved with the committee, and its decision  
26 making,

26 <sup>2</sup> The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are  
27 to this code. The regulations of the Fair Political Practice Commission are contained in §§ 18110 through 18997 of  
28 Title 2 of the California Code of Regulations, and all regulatory references are to this source.



1 **SUMMARY OF THE LAW**

2 The Act and its regulations are amended from time to time. The discussion below regarding  
3 jurisdiction, the standard for finding probable cause, and the contents of the probable cause report  
4 includes references to current law. Unless otherwise noted, all other legal references and discussions of  
5 law pertain to the Act’s provisions as they existed at the time of the violations in this case.

6 Jurisdiction

7 The Fair Political Practices Commission (the “Commission”) has primary responsibility for the  
8 impartial, effective administration and implementation of the Act.<sup>3</sup> This includes enforcement through  
9 administrative prosecution.<sup>4</sup> However, before the Commission’s Enforcement Division may commence  
10 administrative prosecution by filing/serving an Accusation, a hearing officer (either the General  
11 Counsel of the Commission or another attorney in the Commission’s Legal Division) must determine  
12 whether there is probable cause that supports a reasonable belief or strong suspicion that one or more  
13 violations of the Act occurred.<sup>5</sup> Any finding of probable cause is required by law to be announced  
14 publicly, which includes the posting of a summary of the allegations on the Commission’s website.<sup>6</sup>  
15 After a finding of probable cause, the Commission may then hold a hearing to determine what  
16 violations have occurred—and levy an administrative penalty of up to \$5,000 for each violation.<sup>7</sup>

17 Standard for Finding Probable Cause

18 For the hearing officer to make a finding of probable cause, it is only necessary that he or she be  
19 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act  
20 has been violated.<sup>8</sup> Probable cause may only be found if the Respondents were notified of the violations  
21 at least 21 days prior to the hearing officer’s consideration of the alleged violations.<sup>9</sup>

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<sup>3</sup> Section 83111.

24 <sup>4</sup> Section 83116.

25 <sup>5</sup> Sections 83115.5 and 83116; Regulations 18361, subd. (b), and 18361.4.

26 <sup>6</sup> Regulation 18361.4, subd. (g).

27 <sup>7</sup> Section 83116; Regulation 18361.4, subd. (g).

28 <sup>8</sup> Regulation 18361.4, subd. (a).

<sup>9</sup> Section 83115.5.

1 Contents of the Probable Cause Report

2 The probable cause report is required to contain a summary of the law and evidence that  
3 supports a finding of probable cause that each alleged violation of the Act has occurred, as well as a  
4 description of any exculpatory evidence indicating a violation alleged in the report did not occur. The  
5 evidence recited in the probable cause report may include hearsay.<sup>10</sup>

6 Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act

7 When enacting the Act, the people of California found and declared that previous laws  
8 regulating political practices suffered from inadequate enforcement by state and local authorities.<sup>11</sup> For  
9 this reason, the Act is to be construed liberally to accomplish its purposes.<sup>12</sup>

10 One purpose of the Act is to promote transparency by ensuring that receipts and expenditures in  
11 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper  
12 practices are inhibited.<sup>13</sup> Along these lines, the Act includes a comprehensive campaign reporting  
13 system.<sup>14</sup> Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act  
14 will be “vigorously enforced.”<sup>15</sup>

15 Committee

16 A “committee” includes any person or combination of persons who receives contributions  
17 totaling \$2,000 or more in a calendar year,<sup>16</sup> commonly known as a “recipient committee.”

18 General Purpose Committee

19 “General purpose committee” means any recipient committee which is formed or exists  
20 primarily to support or oppose more than one candidate or ballot measure in more than one  
21 jurisdiction.<sup>17</sup>

22  
23 <sup>10</sup> Regulation 18361.4, subd. (b).

24 <sup>11</sup> Section 81001, subd. (h).

25 <sup>12</sup> Section 81003.

26 <sup>13</sup> Section 81002, subd. (a).

27 <sup>14</sup> Sections 84200, *et seq.*

28 <sup>15</sup> Section 81002, subd. (f).

<sup>16</sup> Section 82013, subd. (a).

<sup>17</sup> Section 82027.5, subd. (a).

1 Primarily Formed Committee

2 A “primarily formed committee” means a recipient committee which is formed or exists  
3 primarily to support or oppose any of the following: a single candidate; a single measure; a group of  
4 specific candidates being voted upon in the same city, county, or multicounty election; or two or more  
5 measures being voted upon in the same city, county, multicounty, or state election.<sup>18</sup> A recipient  
6 committee is considered to be “formed or existing primarily to support or oppose” a candidate or  
7 measure if the committee’s primary purpose and activities are to support or oppose candidates or  
8 measures, or if the committee makes more than 70% of its total contributions and expenditures on all  
9 candidates and measures on those specific candidates or measures during the relevant time period.<sup>19</sup>  
10 Within 30 days of the designation of the numerical order of propositions appearing on the ballot, any  
11 committee which is primarily formed to support or oppose a ballot measure shall, if supporting the  
12 measure, include the statement, “a committee for Proposition \_\_,” in any reference to the committee  
13 required by law.<sup>20</sup>

14 Duty to File and Amend a Statement of Organization

15 A recipient committee must file a statement of organization within 10 days of the committee  
16 reaching the \$2,000 threshold.<sup>21</sup> The statement is required to include the name of the committee.<sup>22</sup> If  
17 there is a change to any of the information contained in the statement of organization, an amendment  
18 shall be filed within 10 days to reflect the change.<sup>23</sup>

19 Duty to File Campaign Statements

20 The Act requires committees and treasurers to file campaign statements and reports at specific  
21 times disclosing information regarding contributions received and expenditures made by the campaign  
22 committees.<sup>24</sup> If the filing due date for a statement or report falls on a Saturday, Sunday, or official state

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23 <sup>18</sup> Section 82047.5

24 <sup>19</sup> Regulation 18247.5, subd. (c)(3).

25 <sup>20</sup> Section 84017.

26 <sup>21</sup> Section 84101.

27 <sup>22</sup> Section 84102.

28 <sup>23</sup> Section 84103, subd (a).

<sup>24</sup> See Section 84200, *et seq.*

1 holiday, then the filing due date shall be extended to the next regular business day.<sup>25</sup> This extension  
2 does not apply to 24-hour contribution reports when the due date for these reports falls on a Saturday,  
3 Sunday, or official state holiday immediately prior to an election.<sup>26</sup>

#### 4 Duty to File Pre-Election Campaign Statements

5 General purpose committees shall file the applicable pre-election campaign statements if it  
6 makes contributions or independent expenditures totaling \$500 or more in connection with the General  
7 Election during the period covered by the pre-election campaign statements.<sup>27</sup> Primarily formed  
8 committees to support or oppose a measure appearing on the ballot to be voted on at the next election  
9 shall also file pre-election campaign statements.<sup>28</sup>

10 The first pre-election campaign statement, for the period ending in 45 days before the election,  
11 shall be filed no later than 40 days before the election.<sup>29</sup> A candidate must file a second pre-election  
12 statement for the reporting period ending 17 days before the election no later than 12 days before the  
13 election.<sup>30</sup> If the person has not previously filed a campaign statement, the period covered begins on  
14 January 1.<sup>31</sup>

15 For the November 6, 2018 General Election, committees were required to file the first pre-election  
16 campaign statements for the period of July 1, 2018 to September 22, 2018, no later than September 27,  
17 2018. Committees were also required to file the second pre-election campaign statement for the period  
18 September 23, 2018 October 20, 2018, no later than October 25, 2018.

#### 19 Duty to File Semiannual Campaign Statements

20 A committee must file semi-annual campaign statements beginning in the period in which the  
21 committee qualified and continuing until the committee terminates.<sup>32</sup> A committee must file a semi-

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23 <sup>25</sup> Regulation 18116, subd. (a).

24 <sup>26</sup> Regulation 18116, subd. (b).

25 <sup>27</sup> Section 84200.5, subd. (e)

26 <sup>28</sup> Section 84200.5, subd. (a).

27 <sup>29</sup> Section 84200.8, subd. (a).

28 <sup>30</sup> Section 84200.8, subd. (b).

<sup>31</sup> Section 842046, subd. (b).

<sup>32</sup> Section 84200, subd. (a).

1 annual statement by January 31 for the period ending December 31 of the previous year, and by July 31  
2 for the period ending June 30.<sup>33</sup> Whenever the deadline falls on a Saturday, Sunday or official state  
3 holiday, the filing deadline for a statement shall be extended to the next regular business day.<sup>34</sup>

4 Duty to file 24-Hour Contribution Reports

5 Under the Act, a “late contribution” includes a contribution that totals in the aggregate \$1,000 or  
6 more and is made to or received by a candidate, a controlled committee, or a committee formed or  
7 existing primary to support or oppose a candidate or measure during the 90-day preceding the date of  
8 the election, or on the date of the election, at which the candidate or measure is to be voted on.<sup>35</sup> Each  
9 candidate or committee that makes or receives a late contribution shall report the late contribution  
10 within 24 hours of the time it is made or received.<sup>36</sup>

11 Duty to Report Contributor Information

12 The Act requires committees to report on campaign statements the following information about  
13 a person who makes, in the aggregate, contributions of \$100 or more: (1) full name; (2) street address;  
14 (3) occupation; (4) employer, or if self-employed, the name of the contributor’s business; (5) the date  
15 and amount of each contribution received from the contributor during the reporting period; and (6) the  
16 cumulative amount of contributions received from the contributor.<sup>37</sup>

17 Recordkeeping

18 It is the duty of each committee treasurer to maintain detailed accounts, records, bills, and  
19 receipts necessary to prepare campaign statements and to establish that campaign statements were  
20 properly filed.<sup>38</sup> This duty includes maintenance of detailed information and original source  
21 documentation for a period of four years following the date the campaign statement to which they relate  
22

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23 <sup>33</sup> Section 84200

24 <sup>34</sup> Regulation 18116, subd. (a)

25 <sup>35</sup> Section 82036, subd. (a).

26 <sup>36</sup> Section 84203.

27 <sup>37</sup> Section 84211, subd. (f).

28 <sup>38</sup> Section 84104.

1 is filed.<sup>39</sup> Examples if original source documentation that must be maintained includes copies of bills,  
2 receipts, and invoices for expenditures of \$25 or more.<sup>40</sup>

### 3 Prohibition Against Cash Contributions and Expenditures of \$100 or More

4 No contribution of \$100 or more may be made or received in cash.<sup>41</sup> All contributions of \$100  
5 or more must be made in the form of a written instrument containing the name of the contributor and  
6 the name of the payee and drawn from the account of the contributor.<sup>42</sup>

7 The Act further prohibits making an expenditure of \$100 or more in cash.<sup>43</sup> The Act defines  
8 “expenditure: as a payment, forgiveness of a loan, payment of a loan by a third party, or an enforceable  
9 promise to make payment, unless it is clear from the surrounding circumstances that it is not made for  
10 political purposes.<sup>44</sup>

### 11 Joint and Several Liability of Principal Officer, Treasurer and Committee

12 Every committee must have a treasurer.<sup>45</sup> Committees must also identify a principal officer.<sup>46</sup>  
13 This individual is primarily responsible for approving the political activities of the committee,  
14 including, but not limited to, authorizing the content of communications, authorizing expenditures,  
15 including contributions, on behalf of the committee, and determining the committee’s campaign  
16 strategy.<sup>47</sup> It is the duty of the treasurer and the principal officer to ensure that the committee complies  
17 with all the requirements of the Act.<sup>48</sup> For campaign reporting/filing obligations, the treasurer and the  
18 principal officer are liable, along with the committee, for violations of the Act.<sup>49</sup> If two or more  
19 persons are responsible for any violation, they shall be held jointly and severally liable.<sup>50</sup>

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21 <sup>39</sup> Regulation 18401, subd. (b)(2).

22 <sup>40</sup> Regulation 18401, subd. (a)(4).

23 <sup>41</sup> Section 84300, subd. (a).

24 <sup>42</sup> Section 84300, subd. (c).

25 <sup>43</sup> Section 84300, subd. (b).

26 <sup>44</sup> Section 82025.

27 <sup>45</sup> Section 84100.

28 <sup>46</sup> Section 84102, subd. (c).

<sup>47</sup> Section 82047.6.

<sup>48</sup> Sections 81004, 84100, 84104, and 84213, and Regulation 18427.

<sup>49</sup> Section 83116.5 and Regulation 18316.6.

<sup>50</sup> Section 83116.5 and 91006.

1 **SUMMARY OF THE EVIDENCE**

2 *Background*

3 According to witness interviews, KCPR is made up of local medical marijuana activists who  
4 represent marijuana related policy issues in both Kern County and the City of Bakersfield. KCPR filed  
5 its original Statement of Qualification (“Form 410”) with the Secretary of State’s Office (“SOS”) as  
6 general purpose committee on April 12, 2011. Campaign statements filed by KCPR with SOS show  
7 KCPR was active in several elections through 2018, and confirmed it represented issues in both Kern  
8 County and the City of Bakersfield.

9 On January 22, 2018, KCPR filed a Form 410 with SOS indicating they were a primarily  
10 formed City of Bakersfield committee “formed to support measurers for patient rights and oppose that  
11 are not for patient rights.” During the relevant time periods, Hiestand served as the treasurer, and Jarvis  
12 was a principal officer. Linda Jarvis also served as a principal officer; however she is now deceased.

13 In 2018, a second committee, Kern Neighborhoods, was created, which consisted of the same  
14 group of activists connected to KCPR. Kern Neighborhoods filed its initial Form 410 with SOS and  
15 Kern County on September 19, 2018, identifying as a primarily formed ballot measure committee in  
16 support of Measure J. At the relevant time periods, Hiestand was named as the treasurer. Although  
17 Blakeley served as the assistant treasurer and principal officer, he signed all campaign statements.

18 Interviews conducted with volunteers and officers during the investigation confirmed KCPR  
19 supported Measure J and Measure O, and Kern Neighborhoods supported both Measure J and Measure  
20 O. During a recorded interview conducted by Special Investigator Kaitlin Osborn (“Osborn”) on  
21 December 29, 2022, Heather Iriart (“Iriart”) revealed she was an active member of KCPR since 2011  
22 and a proponent of both Measure J and Measure O. In 2016, Iriart was working with KCPR and  
23 Respondent Jarvis to qualify Measure O for the City of Bakersfield. Respondent Jarvis and Iriart later  
24 became the proponents of Measure O. In addition, Iriart explained around May 2018, KCPR started the  
25 petition drive for Measure J. Her and Jarvis later became the proponents of Measure J. According to an  
26 interview on September 15, 2022 between Osborn and Blakeley, the assistant treasurer of Kern

1 Neighborhoods, Blakeley confirmed that Jarvis put together Kern Neighborhoods. Finally, during an  
2 interview on September 23, 2022 with Osborn and Hiestand, the treasurer of KCPR in 2018, Hiestand  
3 explained the two committees were fighting for the “same idea” and supporting local medical cannabis  
4 collectives.

5 During the relevant time periods, KCPR and Kern Neighborhoods made numerous mistakes.  
6 Both committees failed to timely file campaign statements and received cash contributions over \$100.  
7 Kern Neighborhoods additionally failed to report contributor information, failed to maintain adequate  
8 records, and made expenditures over \$100 in cash. Ultimately, the lack of records precluded the  
9 Enforcement Division from determining if other violations of the Act occurred.

10 *KCPR Violations*

11 Failure to Timely File Campaign Statements

12 In 2018, KCPR filed an amendment to their Form 410 with SOS on January 22, 2018, indicating  
13 they were a city committee “formed to support measures for patient rights and oppose that are not for  
14 patient rights.” Hiestand served as the treasurer, with Jarvis and Linda Jarvis serving as the principal  
15 officers. KCPR filed a termination Form 410 with a termination date of December 31, 2018 with SOS  
16 and City of Bakersfield on February 1, 2019.

17 In 2018, KCPR filed its first and only semiannual campaign statement with the City of  
18 Bakersfield covering the period of January 1, 2018 to June 30, 2018 on August 1, 2018, one day late.  
19 The next statement KCPR filed was the termination Form 410. A review of KCPR’s campaign  
20 statements reveals KCPR made more than \$500 in independent expenditures towards the 2018 General  
21 Election. Therefore, it was required to file pre-election campaign statements. Based on its expenditures  
22 and the date of termination, KCPR was required to file two pre-election campaign statements, and a  
23 semi-annual campaign statement. Below is a chart of the missing filings:

24 //

25 //

26 //



<b>Statement Period</b>	<b>Due Date</b>	<b>Date Filed</b>
1/1/18 to 6/30/18	7/31/18	8/1/18
7/1/18 to 9/22/18	9/27/18	Not Filed
9/23/18 to 10/20/18	10/25/18	Not Filed
10/21/18 to 12/31/18	1/31/19	Not Filed

Improper Cash Contributions

KCPR was prohibited from receiving contributions of more than \$100 in cash, however the evidence shows that contributions totaling \$16,000 were received by KCPR in cash. In their recorded interview on December 29, 2022, Iriart stated KCPR was primarily funded with cash because “none of the contributors (dispensaries) had access to a bank account.” This statement is supported by the fact that marijuana is currently illegal at the federal level and providing financial services to cannabis industry clients requires consistent monitoring and oversight and is often a risk to the financial institution.

Additionally, records of a cash ledger obtained from Blakeley and statements made by Blakeley support that contributions were collected in cash. In particular, contributions listed in the cash ledger on a page titled “KCPR Spreadsheet” could be matched to contributions KCPR reported on the only campaign statement it filed. Amounts, dates, and contributor information could be matched totaling \$16,000. Below is a chart of the \$16,000 in contributions reported by KCPR:

<b>Statement</b>	<b>Date Received</b>	<b>Contributor</b>	<b>Contribution Amount</b>
1/1/18 to 6/30/18	4/16/18	Tanner Vest Collective	\$5,000
1/1/18 to 6/30/18	4/16/18	Antelope Valley Diamond Collective	\$5,000
1/1/18 to 6/30/18	4/16/18	The Healing Co-op Inc.	\$2,000
1/1/18 to 6/30/18	4/20/18	Antelope Valley Diamond Collective	\$2,000
1/1/18 to 6/30/18	4/20/18	Tanner Vest Collective	\$2,000

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*Kern Neighborhoods Violations*

Failure to Timely File the Statement of Organization

A recipient committee must file a statement of organization within 10 days of the committee reaching the \$2,000 threshold.<sup>51</sup> Kern Neighborhoods filed its initial Form 410 with SOS on September 19, 2018 indicating the date of qualification was April 16, 2018. Records provided by Blakeley confirmed the date of qualification was April 16, 2018. Kern Neighborhoods was required to file its statement of organization no later than April 26, 2018. Therefore, Kern Neighborhoods did not timely file its statement of organization.

Failure to Timely File Campaign Statements

Kern Neighborhoods, as a primarily formed committee in support of Measure J, was required to timely file pre-election campaign statements.<sup>52</sup> A review of the campaign statements during the relevant time period confirmed more than 70% of its total contributions and expenditures were made on Measure J.

The first campaign statement filed by Kern Neighborhoods in Kern County was the first pre-election statement covering the period of January 1, 2018 to September 22, 2018. The statement was filed on October 11, 2018, 15 days late. Based on the reported date of qualification as well as contributions reported as early as April 16, 2018 on the pre-election statement, Kern Neighborhoods was required to file a semi-annual statement covering the period of January 1, 2018 to June 30, 2018 by the July 31, 2018 due date. Therefore, the pre-election statement filed by Kern Neighborhoods was required to cover the period of July 1, 2018 to September 22, 2018, instead of January 1, 2018 to September 22, 2018. Kern Neighborhoods then timely filed its second pre-election statement covering the period of September 23, 2018 to October 10, 2018.

Kern Neighborhoods filed a termination semiannual campaign statement covering the period of October 21, 2018 to January 31, 2019 on February 14, 2019, with a termination date of November 13,

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<sup>51</sup> Section 84101.

<sup>52</sup> Section 84200.5, subd. (a).

2018. This statement should have covered the period of October 21, 2018 to November 13, 2018 and was due on January 31, 2019. Therefore, this statement was untimely filed. The following is a summary of the late and missing filings:

Type	Period Covered	Date Filed	Due	Days Late
Form 410	N/A	9/19/18	4/26/18	146
Semi-Annual	1/1/18 to 6/30/18	Not Filed	7/31/18	N/A
1 <sup>st</sup> Pre-election	7/1/18 to 9/22/18 <sup>53</sup>	10/11/18	9/27/18	15
2 <sup>nd</sup> Pre-election	9/23/18/ to 10/20/18	10/23/18	10/25/18	0
Semi-Annual	10/21/18 to 12/31/18 <sup>54</sup>	2/14/19	1/31/19	14

Failure to Timely File 24-Hour Contribution Report

On the second pre-election campaign statement covering the period of September 23, 2018 to October 20, 2018 Kern Neighborhoods reported one contribution in the amount of \$1,217 from Vape and Bake received on October 17, 2018. The contribution reported is over \$1,000, and therefore required a 24-hour contribution report to be filed by October 18, 2018. According to filing officer records in Kern County, Kern Neighborhoods failed to timely file the required 24-hour contribution report.

Failure to Report Contributor Information

The Act requires committees reporting on campaign statements to include the date and amount of each contribution received from the contributor during the reporting period and the cumulative amount of contributions received from the contributor. On the campaign statement covering the period of January 1, 2018 to September 22, 2018 Kern Neighborhoods reported several contributions over

<sup>53</sup> Instead of filing for the period covering June 1, 2018 to September 22, 2018, Kern Neighborhoods dated the statement January 1, 2018 to September 22, 2018.

<sup>54</sup> The filed statement covered a broader reporting period of October 21, 2018 to January 31, 2019.

1 \$1,000, with contribution amounts ranging from \$2,000 to \$83,120. In the “date received” section of  
2 Schedule A of that campaign statement, Kern Neighborhoods cited date ranges for the contributions,  
3 instead of the specific date each contribution was made and the cumulative total from the contributor.  
4 Therefore, Kern Neighborhoods failed to timely report all contributor information, as required.

5 Failure to Maintain Adequate Campaign Records

6 Adequate records were not maintained for all reported contributions totaling \$203,287 and  
7 expenditures totaling \$202,342. On February 6, 2019 the Enforcement Division requested all records  
8 from Kern Neighborhoods, including but not limited to bank statements, copies of contributor checks,  
9 deposit slips, and all invoices for the committee. Responsive materials to the records request failed to  
10 substantiate the committee’s campaign activity. Additionally, on March 18, 2019 a subpoena was  
11 issued to the Kern Neighborhoods campaign bank account requesting relevant records covering the  
12 period of January 1, 2018 to December 31, 2018. Responsive materials to the subpoena revealed three  
13 transactions through the campaign bank account, as detailed subsequently.

14 Treasurer Hiestand, as part of his interview with Osborn, was asked again whether he  
15 maintained any of the Kern Neighborhood’s records. Hiestand sated he did not have any records for  
16 Kern Neighborhoods. Importantly, all campaign statements reflect that Blakeley, the assistant treasurer  
17 signed all statements for Kern Neighborhoods.

18 Assistant treasurer Blakeley, during his recorded interview on September 15, 2022, was asked  
19 to provide records for the committee. He stated he maintained some records for Kern Neighborhoods in  
20 2018 which he kept in a record book. Blakeley indicated when the Enforcement Division requested  
21 records February 6, 2019, Blakeley was unable to locate the record book. However, since then, he was  
22 able to locate it. Blakeley described the record book as a handwritten cash ledger of all payments  
23 received with information regarding when and who payments were received from.

24 After the recorded interview, Blakeley provided Osborn with photos of an incomplete cash  
25 ledger. The cash ledger consisted of pages titled “KCPR spreadsheet,” “Cash Receipts Paid to  
26 Coordinators” and “Cash Out Receipt Banked.” The first two pages also had a column titled “\$ for  
27

1 Signatures” with a list of names and local dispensaries under it. The third page, “Cash Out Receipt  
2 Banked” had a similar column titled “\$ for association.” The book contained some information on  
3 advertising expenses and other hand-written notations pertaining to the financial activity of Kern  
4 Neighborhoods. The cash ledger pages also contained notes in the margins with what appears to be  
5 totals. The totals listed however did not match the amounts listed on other pages. No additional  
6 invoices, receipts, or records were produced to support Kern Neighborhoods contributions or  
7 expenditures.

8         During the recorded interview, records specifically related to advertisements produced by Kern  
9 Neighborhoods in support of Measure J were requested. According to Blakeley, some advertising was  
10 paid for directly by various collectives as non-monetary contributions. Other than the cash ledger, no  
11 additional invoices, receipts, or records were produced to support these payments or confirm details  
12 about any advertisements.

13         In summary, the records Blakeley provided failed to substantiate the campaign statements and  
14 their accuracy. The cash ledger photos and the campaign bank account statements do not provide a  
15 clear record of contributions received and expenditures made by Kern Neighborhoods. The lack of  
16 records precluded the Enforcement Division from confirming all reported contributions and  
17 expenditures. The lack of records also precluded the Enforcement Division from determining any other  
18 violations of the Act including, but not limited to, failure to accurately report contributions,  
19 expenditures and sub vendor information, failure to timely file additional 24-hour contribution reports,  
20 advertisement disclosure violations, money laundering, and misuse of campaign funds.

#### 21 Improper Cash Contributions and Expenditures

22         Kern Neighborhoods received all reported contributions totaling \$202,387 and made  
23 expenditures totaling \$202,342 solely with cash. During Blakeley’s recorded interview with Osborn,  
24 Blakeley stated he collected contributions by going to various dispensary locations, in person, to collect  
25 envelopes of money. The envelope’s contained the cash contributions. When asked approximately how  
26 much cash was collected Blakeley explained it was “quite a bit, thousands and thousands, tens of  
27

1 thousands.” Blakeley summarized; it was “a lot of money over a lot of time.” Blakeley stated once he  
2 received the cash, he did not deposit the cash contributions into the bank account for Kern  
3 Neighborhoods.

4 A review of Kern Neighborhoods bank account confirmed that contributions were not deposited  
5 into the committee bank account. The bank account showed three transactions. On October 15, 2018  
6 two deposits were made at Family Dollar, the first for \$400 and the second for \$300. On October 16,  
7 2018 a transaction was made to Intermarket Manufacturer for \$608. The lack of deposits in the bank  
8 account supports the claim Kern Neighborhoods worked primarily in cash.

9 After the cash was picked up by Blakeley, Blakeley stated the cash was brought directly to  
10 Phillip Ganong’s (“Ganong”) law office. Blakeley further stated Ganong then distributed the cash at his  
11 law office and that most of the cash, if not all, was used for signature canvassers. However, Blakeley  
12 stated he had no documents, other than the cash ledger, to show what the cash was used for. Blakeley  
13 stated Mike Myers (“Myers”) received some of the cash envelopes directly but other than Myers, he  
14 never physically saw where the money went after it was dropped off at Ganong’s law office. Myers was  
15 listed as receiving \$189, 211 dollars over the period of January 1, 2018 to September 22, 2018 on Kern  
16 Neighborhoods campaign statement covering the period of January 1, 2018 to September 22, 2018.

17 Iriart also confirmed Kern Neighborhoods collected contributions in cash. During her recorded  
18 interview, Iriart stated the Measure J committee “was working with straight cash.” In a subsequent,  
19 non-recorded interview with Osborn on January 5, 2023 Iriart confirmed the information Blakeley  
20 stated. Iriart reiterated cash was received and “people were paid out in cash.” She stated cash was  
21 dropped of at Ganong’s law office and kept in a safe overnight because “it was too much cash to carry  
22 around.” Iriart additionally stated several people, including herself, had access to the safe, and that cash  
23 was exchanged at Ganong’s office between parties. However, Iriart could not provide additional  
24 information regarding how the cash was distributed after it was dropped off at Ganong’s law office.  
25 Below is a chart of all reported contributions received in cash to Kern Neighborhoods, totaling  
26 \$202,387:

Statement Period	Date <sup>55</sup>	Name/Contributor	Contribution Amount
1/1/18 to 9/22/18	4/16/18 to 7/17/18	Antelope Valley Diamond Collective	\$55,250
1/1/18 to 9/22/18	4/16/18 to 8/1/18	Tanner Vest Collective	\$83,120
1/1/18 to 9/22/18	5/6/18 to 8/2/18	Plum Tree Collective	\$29,000
1/1/18 to 9/22/18	6/5/18 to 9/9/18	Vape and Bake	\$10,900
1/1/18 to 9/22/18	6/5/18 to 9/9/18	County Line Organics	\$10,900
1/1/18 to 9/22/18	5/26/18 to 5/30/18	Organic Health Solutions	\$6,000
1/1/18 to 9/22/18	5/14/18	Big O Relief	\$2,000
1/1/18 to 9/22/18	4/16/18 to 5/1/18	Therapeutic Health Center	\$4,000
9/23/18 to 10/20/18	10/17/18	Vape and Bake	\$1,217

Below is a chart of all reported expenditures made in cash by Kern Neighborhoods, totaling \$202,342:

Statement Period	Name of Payee	Description of Payment	Expenditure Amount
1/1/18 to 9/22/18	Mike Myers	For signature gathering to get initiative on ballot	\$189, 211
1/1/18 to 9/22/18	Vape and Bake	Billboards and Shirts Yes on J	\$6,857
1/1/18 to 9/22/18	Tanner Vest Collective	Billboards Yes on J	\$5,057
1/1/18 to 9/22/18	Vape and Bake	Yard Signs	\$1,217

## VIOLATIONS

### *KCPR Violations*

#### Count 1: Failure to Timely File Pre-election Campaign Statement

KCPR, Hiestand, and Jarvis failed to timely file the pre-election campaign statement for the reporting period of July 1, 2018 to September 22, 2018 in violation of Section 84200.5, subdivision (a); and 84200.8, subdivision (b).

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<sup>55</sup> Kern Neighborhoods failed to report specific dates of contributions, but instead reported contributions in lump sums with corresponding date ranges.

1 Count 2: Failure to Timely File Pre-election Campaign Statement

2 KCPR, Hiestand, and Jarvis failed to timely file the pre-election campaign statement for the  
3 reporting period of September 23, 2018 to October 20, 2018 in violation of Sections 84200.5,  
4 subdivision (a); and 84200.8, subdivision (b).

5 Count 3: Failure to Timely File Semiannual Campaign Statement

6 KCPR, Hiestand, and Jarvis failed to timely file the semiannual campaign statement for the  
7 reporting period of October 21, 2018 to December 31, 2018, in violation of Section 84200, subdivision  
8 (a).

9 Count 4: Improper Cash Contributions of \$100 or More

10 KCPR, Hiestand, and Jarvis accepted cash contributions of more than \$100, during the reporting  
11 period of January 1, 2018 to June 30, 2018, in violation of Section 84300, subdivision (a).

12 Count 5: Improper Cash Contributions of \$100 or More

13 KCPR, Hiestand, and Jarvis accepted cash contributions of more than \$100, during the reporting  
14 period of July 1, 2018 to September 22, 2018, in violation of Section 84300, subdivision (a).

15 *Kern Neighborhoods*

16 Count 6: Failure to Timely File an Amendment to Statement of Organization

17 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the statement of organization  
18 within 10 days of qualifying as a committee, in violation of Section 84101(a).

19 Count 7: Failure to Timely File Semiannual Campaign Statement

20 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the semiannual campaign  
21 statement for the reporting period of January 1, 2018 to June 30, 2018, in violation of Section 84200,  
22 subdivision (a).

23 Count 8: Failure to Timely File Pre-election Campaign Statement

24 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the pre-election campaign  
25 statement for the reporting period of July 1, 2018 to September 22, 2018 in violation of Sections  
26 84200.5, subdivision (a); and 84200.8, subdivision (b).



1 Count 9: Failure to Timely File Pre-election Campaign Statement

2 Kern Neighborhoods, Hiestand, Edwards and Blakeley failed to timely file the pre-election  
3 campaign statement for the reporting period of September 23, 2018 to October 20, 2018 in violation of  
4 Sections 84200.5, subdivision (a); and 84200.8, subdivision (b).

5 Count 10: Failure to Timely File Semiannual Campaign Statement

6 Kern Neighborhoods, Hiestand, Blakeley failed to timely file the semiannual campaign statement  
7 for the reporting period of October 21, 2018 to December 31, 2018, in violation of Section 84200,  
8 subdivision (a).

9 Count 11: Failure to Timely File A 24-Hour Contribution Report

10 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file a 24-hour contribution report for a  
11 \$1,217 contribution received on October 17, 2018, in violation of Section 84203.

12 Count 12: Failure to Report Contributor Information

13 Kern Neighborhoods, Hiestand, and Blakeley failed to timely report the date of each contribution  
14 on the pre-election campaign statement covering the period of July 1, 2018 to September 22, 2018, in  
15 violation of Section 84211, subdivision (f).

16 Count 13: Failure to Keep Adequate Records

17 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
18 Kern Neighborhood's contributions and expenditures during the reporting period of January 1, 2018 and  
19 June 31, 2018, in violation of Section 84104.

20 Count 14: Failure to Keep Adequate Records

21 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
22 Kern Neighborhood's contributions and expenditures during the reporting period of July 1, 2018 to  
23 September 22, 2018, in violation of Section 84104.

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1 Count 15: Failure to Keep Adequate Records

2 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
3 Kern Neighborhood's contributions and expenditures during the reporting period of September 23, 2018  
4 to October 20, 2018, in violation of Section 84104.

5 Count 16: Failure to Keep Adequate Records

6 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
7 Kern Neighborhood's contributions and expenditures during the reporting period of October 21, 2018 to  
8 December 31, 2018, in violation of Section 84104.

9 Count 17: Improper Cash Contributions of \$100 or More

10 Kern Neighborhoods, Hiestand, and Blakeley accepted cash contributions of more than \$100  
11 during the reporting period of July 1, 2018 to September 22, 2018, in violation of Section 84300,  
12 subdivision (a).

13 Count 18: Improper Cash Contributions of \$100 or More

14 Kern Neighborhoods, Hiestand, and Blakeley accepted cash contributions of more than \$100  
15 during the reporting period of September 23, 2018 to October 20, 2018, in violation of Section 84300,  
16 subdivision (a).

17 Count 19: Improper Cash Expenditures of \$100 or More

18 Kern Neighborhoods, Hiestand, and Blakeley made cash expenditures of more than \$100 during  
19 the reporting period of July 1, 2018 to September 22, 2018, in violation of Section 84300, subdivision  
20 (b).

21 **EXCULPATORY INFORMATION**

22 Respondents, Blakeley and Hiestand were cooperative with the Enforcement Division in their  
23 investigation into the potential violations in this case. Although both Kern Neighborhoods and KCPR  
24 filed campaign statements late and have missing campaign statements, the statements both committees  
25 filed were filed prior to the election.

1 As part of his interview with Osborn, Hiestand was asked again whether he maintained any of  
2 the Kern Neighborhood's records. Hiestand stated he was put on the Kern Neighborhoods campaign  
3 forms as the treasurer without his consent and never agreed to the position. Hiestand stated he did not  
4 have any records for Kern Neighborhoods. Blakeley confirmed this information during the course of  
5 the investigation, and confirmed he, not Hiestand, signed all campaign statements for Kern  
6 Neighborhoods.

7 **CONCLUSION**

8 Probable cause exists to believe respondents Kern Neighborhoods, KCPR, Edwards, Blakley  
9 Hiestand, and Jeff Jarvis violated the Act as detailed above. The Enforcement Division respectfully  
10 requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.

11 Dated: April 12, 2023

12 Respectfully Submitted,

13 **FAIR POLITICAL PRACTICES COMMISSION**

14 Christopher Burton  
15 Acting Enforcement Chief

16 

17 By: Marissa Nash  
18 Commission Counsel  
19 Enforcement Division

**Exhibit A-2**

**AFFIDAVIT OF SERVICE**

<b>Case:</b> 18/976	<b>Court:</b> THE FAIR POLITICAL PRACTICES COMMISSION	<b>County:</b> Kern	<b>Job:</b> 8702521
<b>Plaintiff / Petitioner:</b> IN THE MATTER OF: KERN CITIZENS FOR PATIENT RIGHTS		<b>Defendant / Respondent:</b>	
<b>Received by:</b> East Kern Attorney Services		<b>For:</b> CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION	
<b>To be served upon:</b> TIM BLAKELEY			

I, Kenneth Yule, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

**Recipient Name / Address:** TIM BLAKELEY, 1809 Jamie Way, Rosamond, CA 93560

**Manner of Service:** Personal/Individual, Apr 14, 2023, 3:35 pm PDT

**Documents:** REPORT IN SUPPORT OF A FINDING OF PROBABLE CAUSE (Received Apr 12, 2023 at 5:26pm PDT)

**Additional Comments:**

1) Successful Attempt: Apr 14, 2023, 3:35 pm PDT at 1809 Jamie Way, Rosamond, CA 93560 received by TIM BLAKELEY. Age: 35; Ethnicity: Caucasian; Gender: Male; Weight: 180; Height: 5'9"; Hair: Red; Eyes: Blue;

  
\_\_\_\_\_  
Kenneth Yule  
694

04/18/2023  
Date

East Kern Attorney Services  
2053 Belshaw Street #817  
Mojave, CA 93501  
(877) 926-2149

**Exhibit A-3**

1 JAMES M. LINDSAY  
Chief of Enforcement  
2 Marissa Corona  
Commission Counsel  
3 **FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q Street, Suite 3050  
4 Sacramento, CA 95811  
Telephone: (279) 237-5932  
5 Email: [MCorona@fppc.ca.gov](mailto:MCorona@fppc.ca.gov)

6 Attorneys for Complainant  
Enforcement Division of the Fair Political Practices Commission

7  
8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**  
9 **STATE OF CALIFORNIA**

10 In the Matter of ) FPPC No. 2018-00976  
11 )  
12 KERN NEIGHBORHOODS FOR ) EX PARTE REQUEST FOR A FINDING OF  
RESPONSIBLE REGULATION IN ) PROBABLE CAUSE AND AN ORDER THAT  
13 SUPPORT OF MEASURE J, LARRY ) AN ACCUSATION BE PREPARED AND  
HIESTAND AND TIM BLAKELEY ) SERVED  
14 ) Gov. Code § 83115.5  
Respondents. )

15 **TO THE HEARING OFFICER OF THE FAIR POLITICAL PRACTICES COMMISSION:**

16 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)<sup>1</sup> and Regulation 18361.4,  
17 Respondents, Kern Neighborhoods for Responsible Regulation in Support of Measure J (“the  
18 Committee”), treasurer Larry Hiestand (“Hiestand”) and assistant treasurer Tim Blakeley (“Blakeley”)  
19 were served with a copy of a report in support of a finding of probable cause (“PC Report”) in the above-  
20 entitled matter.<sup>2</sup> The PC Report, attached as “Exhibit A,” was part of a packet of materials, including a  
21 cover letter, a memorandum describing probable cause proceedings, and a probable cause checklist form.  
22

23  
24  
25 <sup>1</sup> The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this  
code. The regulations of the Fair Political Practices Commission are contained in §§ 18104 through 18998 of Title 2 of the  
California Code of Regulations, and all regulatory references are to this source.

26 <sup>2</sup> Gov. Code § 83115.5; Cal. Code Reg., tit. 2, § 18361.4.

1 The PC report was personally served on Larry Hiestand on April 12, 2023, and on Tim Blakeley on April  
2 14, 2023. A copy of the proof of service for each respondent is attached as “Exhibit B.”

3 In the cover letter dated April 12, 2023, and the attached materials, Respondents were advised that  
4 they could respond in writing to the PC Report and orally present the case to the Hearing Officer at a  
5 probable cause conference to be held in Sacramento. Respondents were further advised that in order to  
6 have a probable cause conference they needed to make a written request for one within 21 days of the date  
7 they received the PC Report, or the date requested records were sent by the Enforcement Division.  
8 Additionally, Respondents were advised that if they did not request a probable cause conference, such a  
9 conference would not be held and probable cause would be determined based solely on the PC Report and  
10 any written response submitted within 21 days of the date of service of the PC Report, or the date requested  
11 records were sent by the Enforcement Division. To date, Respondents have not submitted a written  
12 response or requested a probable cause conference.

13 WHEREFORE, based on the attached PC Report, the Enforcement Division requests a finding by  
14 the Hearing Officer that probable cause exists to believe that the Respondent committed fourteen  
15 violations of the Act, stated as follows:

16 Count 1: Failure to Timely File an Amendment to Statement of Organization

17 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the statement of organization  
18 within 10 days of qualifying as a committee, in violation of Section 84101(a).

19 Count 2: Failure to Timely File Semiannual Campaign Statement

20 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the semiannual campaign  
21 statement for the reporting period of January 1, 2018 to June 30, 2018, in violation of Section 84200,  
22 subdivision (a).

23 Count 3: Failure to Timely File Pre-election Campaign Statement

24 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the pre-election campaign  
25 statement for the reporting period of July 1, 2018 to September 22, 2018 in violation of Sections  
26 84200.5, subdivision (a); and 84200.8, subdivision (b).



1 Count 4: Failure to Timely File Pre-election Campaign Statement

2 Kern Neighborhoods, Hiestand, Edwards and Blakeley failed to timely file the pre-election  
3 campaign statement for the reporting period of September 23, 2018 to October 20, 2018 in violation of  
4 Sections 84200.5, subdivision (a); and 84200.8, subdivision (b).

5 Count 5: Failure to Timely File Semiannual Campaign Statement

6 Kern Neighborhoods, Hiestand, Blakeley failed to timely file the semiannual campaign statement  
7 for the reporting period of October 21, 2018 to December 131, 2018, in violation of Section 84200,  
8 subdivision (a).

9 Count 6: Failure to Timely File A 24-Hour Contribution Report

10 Kern Neighborhoods, Hiestand, and Blakeley failed to timely a 24-hour contribution report for a  
11 \$1,217 contribution received on October 17, 2018, in violation of Section 84203.

12 Count 7: Failure to Report Contributor Information

13 Kern Neighborhoods, Hiestand, and Blakeley failed to timely report the date of each contribution  
14 on the pre-election campaign statement covering the period of July 1, 2018 to September 22, 2018, in  
15 violation of Section 84211, subdivision (f).

16 Count 8: Failure to Keep Adequate Records

17 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
18 Kern Neighborhood's contributions and expenditures during the reporting period of January 1, 2018 and  
19 June 31, 2018, in violation of Section 84104.

20 Count 9: Failure to Keep Adequate Records

21 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
22 Kern Neighborhood's contributions and expenditures during the reporting period of July 1, 2018 to  
23 September 22, 2018, in violation of Section 84104.

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1 Count 10: Failure to Keep Adequate Records

2 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
3 Kern Neighborhood's contributions and expenditures during the reporting period of September 23, 2018  
4 to October 20, 2018, in violation of Section 84104.

5 Count 11: Failure to Keep Adequate Records

6 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
7 Kern Neighborhood's contributions and expenditures during the reporting period of October 21, 2018 to  
8 December 31, 2018, in violation of Section 84104.

9 Count 12: Improper Cash Contributions of \$100 or More

10 Kern Neighborhoods, Hiestand, and Blakeley accepted cash contributions of more than \$100  
11 during the reporting period of July 1, 2018 to September 22, 2018, in violation of Section 84300,  
12 subdivision (a).

13 Count 13: Improper Cash Contributions of \$100 or More

14 Kern Neighborhoods, Hiestand, and Blakeley accepted cash contributions of more than \$100  
15 during the reporting period of September 23, 2018 to October 20, 2018, in violation of Section 84300,  
16 subdivision (a).

17 Count 14: Improper Cash Expenditures of \$100 or More

18 Kern Neighborhoods, Hiestand, and Blakeley made cash expenditures of more than \$100 during  
19 the reporting period of July 1, 2018 to September 22, 2018, in violation of Section 84300, subdivision  
20 (b).

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1 A copy of this Request was mailed via U.S. Mail to the Respondents on February 8, 2024 at the  
2 last known address, as follows:

3  
4 Larry Hiestand  
5 14012 Calle Rosales  
6 Bakersfield, CA 93314

7 Tim Blakeley  
8 1809 Jamie Way  
9 Rosamond, CA 93560

10 Dated: February 8, 2024

Respectfully Submitted,

11 **FAIR POLITICAL PRACTICES COMMISSION**

12 James M. Lindsay  
13 Chief of Enforcement

14 

15 By: Marissa Corona  
16 Commission Counsel  
17 Enforcement Division

**Exhibit A-4**

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3  
4 In the Matter of ) FPPC No. 2018-00976  
5 )  
6 KERN NEIGHBORHOODS FOR )  
7 RESPONSIBLE REGULATION IN ) FINDING OF PROBABLE CAUSE AND  
8 SUPPORT OF MEASURE J, LARRY ) ORDER TO PREPARE AND SERVE AN  
9 HIESTAND AND TIM BLAKELEY ) ACCUSATION  
10 Respondents. ) Gov. Code § 83115.5  
11 )  
12 )

13 By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation  
14 Be Prepared and Served, dated February 8, 2024 the Enforcement Division submitted the above-entitled  
15 matter to the Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request  
16 for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served (“Ex Parte  
17 Request”), the Enforcement Division personally served a Report in Support of a Finding of Probable Cause  
18 (“PC Report”) on treasurer Larry Hiestand (“Hiestand”) on April 12, 2023 and on assistant treasurer Tim  
19 Blakeley (“Blakeley”) on April 14, 2023. Accompanying the PC Report was a packet of materials that  
20 informed the Respondents of their right to file a written response to the PC Report and to request a probable  
21 cause conference within 21 days following service of the PC Report, or transmittal of any requested  
22 records by the Enforcement Division. During the 21 days that followed service of the PC Report,  
23 Respondents did not file a response to the PC Report, request records, or request a probable cause  
24 conference. Pursuant to California Code of Regulations title 2, section 18361.4,<sup>1</sup> determination of  
25 probable cause may be made solely on papers submitted when the respondent does not request a probable  
26 cause conference.

27 In making a probable cause determination, it is the duty of the Hearing Officer of the Fair Political  
28 Practices Commission to determine whether probable cause exists to believe that a respondent violated

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

1 the Political Reform Act as alleged by the Enforcement Division in the PC Report served on the  
2 respondent.

3 Probable cause to believe a violation has occurred can be found to exist when “the evidence  
4 sufficiently supports a reasonable belief or strong suspicion that the Act has been violated.”<sup>2</sup>

5 The PC Report served on Respondents Hiestand and Blakeley and the subsequent Ex Parte Request  
6 in this matter alleges fourteen violations of the Political Reform Act were committed, as follows:

7 Count 1: Failure to Timely File an Amendment to Statement of Organization

8 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the statement of organization  
9 within 10 days of qualifying as a committee, in violation of Section 84101(a).

10 Count 2: Failure to Timely File Semiannual Campaign Statement

11 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the semiannual campaign  
12 statement for the reporting period of January 1, 2018 to June 30, 2018, in violation of Section 84200,  
13 subdivision (a).

14 Count 3: Failure to Timely File Pre-election Campaign Statement

15 Kern Neighborhoods, Hiestand, and Blakeley failed to timely file the pre-election campaign  
16 statement for the reporting period of July 1, 2018 to September 22, 2018 in violation of Sections  
17 84200.5, subdivision (a); and 84200.8, subdivision (b).

18 Count 4: Failure to Timely File Pre-election Campaign Statement

19 Kern Neighborhoods, Hiestand, Edwards and Blakeley failed to timely file the pre-election  
20 campaign statement for the reporting period of September 23, 2018 to October 20, 2018 in violation of  
21 Sections 84200.5, subdivision (a); and 84200.8, subdivision (b).

22 Count 5: Failure to Timely File Semiannual Campaign Statement

23 Kern Neighborhoods, Hiestand, Blakeley failed to timely file the semiannual campaign statement  
24 for the reporting period of October 21, 2018 to December 131, 2018, in violation of Section 84200,  
25 subdivision (a).

26 Count 6: Failure to Timely File A 24-Hour Contribution Report

27 \_\_\_\_\_  
28 <sup>2</sup> Cal. Code Reg., tit. 2, § 18361.4, subd. (a).

1 Kern Neighborhoods, Hiestand, and Blakeley failed to timely a 24-hour contribution report for a  
2 \$1,217 contribution received on October 17, 2018, in violation of Section 84203.

3 Count 7: Failure to Report Contributor Information

4 Kern Neighborhoods, Hiestand, and Blakeley failed to timely report the date of each contribution  
5 on the pre-election campaign statement covering the period of July 1, 2018 to September 22, 2018, in  
6 violation of Section 84211, subdivision (f).

7 Count 8: Failure to Keep Adequate Records

8 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
9 Kern Neighborhood's contributions and expenditures during the reporting period of January 1, 2018 and  
10 June 31, 2018, in violation of Section 84104.

11 Count 9: Failure to Keep Adequate Records

12 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
13 Kern Neighborhood's contributions and expenditures during the reporting period of July 1, 2018 to  
14 September 22, 2018, in violation of Section 84104.

15 Count 10: Failure to Keep Adequate Records

16 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
17 Kern Neighborhood's contributions and expenditures during the reporting period of September 23, 2018  
18 to October 20, 2018, in violation of Section 84104.

19 Count 11: Failure to Keep Adequate Records

20 Kern Neighborhoods, Hiestand, and Blakeley failed to maintain detailed campaign records for  
21 Kern Neighborhood's contributions and expenditures during the reporting period of October 21, 2018 to  
22 December 31, 2018, in violation of Section 84104.

23 Count 12: Improper Cash Contributions of \$100 or More

24 Kern Neighborhoods, Hiestand, and Blakeley accepted cash contributions of more than \$100  
25 during the reporting period of July 1, 2018 to September 22, 2018, in violation of Section 84300,  
26 subdivision (a).

27 //

28 //

1 Count 13: Improper Cash Contributions of \$100 or More

2 Kern Neighborhoods, Hiestand, and Blakeley accepted cash contributions of more than \$100  
3 during the reporting period of September 23, 2018 to October 20, 2018, in violation of Section 84300,  
4 subdivision (a).


5 Count 14: Improper Cash Expenditures of \$100 or More

6 Kern Neighborhoods, Hiestand, and Blakeley made cash expenditures of more than \$100 during  
7 the reporting period of July 1, 2018 to September 22, 2018, in violation of Section 84300, subdivision  
8 (b).

9 I therefore direct that the Enforcement Division issue an accusation against the Respondents,  
10 Hiestand and Blakeley in accordance with this finding.

11 IT IS SO ORDERED.

12  
13 Dated: February 9, 2024

  
\_\_\_\_\_  
Hearing Officer  
Fair Political Practices Commission



**FPPC No. 2018-00976, In the matter of Kern Neighborhoods for Responsible Regulation in Support of Measure J, Larry Hiestand and Tim Blakeley**

**PROOF OF SERVICE**

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, CA 95811. On the date below, I served the following document:

**FINDING OF PROBABLE CAUSE AND ORDER TO PREPARE AND SERVE AN ACCUSATION**

**MANNER OF SERVICE**

**(U.S. Mail)** By causing a true copy thereof to be served on the parties in this action through the U.S. Mail and addressed as listed below. I am familiar with the procedure of the Fair Political Practices Commission for collection and processing of correspondence for mailing with the United States Postal Service, and the fact that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business.

**SERVICE LIST**

Larry Hiestand  
14012 Calle Rosales  
Bakersfield, CA 93314

Tim Blakeley  
1809 Jamie Way  
Rosamond, CA 93560

**(By Personal Service) On Thursday, February 15, 2024, at approximately 3:30 p.m., I personally served:**

Marissa Corona, Commission Counsel, at 1102 Q Street, Suite 3000, Sacramento, CA 95811.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document is executed at Sacramento, California, on February 15, 2024.

  
\_\_\_\_\_  
Sasha Linker



**Exhibit A-5**

1 JAMES M. LINDSAY  
Chief of Enforcement  
2 MARISSA CORONA  
Commission Counsel  
3 **FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q St, Suite 3050  
4 Sacramento, CA 95811  
Telephone: (279) 237-5932  
5 Email: mcorona@fppc.ca.gov

6 Attorneys for Complainant  
Enforcement Division of the Fair Political Practices Commission  
7

8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**  
9 **STATE OF CALIFORNIA**

10  
11 In the Matter of: ) FPPC No. 18/976  
12 )  
13 KERN NEIGHBORHOODS FOR ) **ACCUSATION**  
RESPONSIBLE REGULATION IN )  
14 SUPPORT OF MEASURE J AND TIM )  
BLAKELEY )  
15 ) (Gov. Code §11503)  
16 Respondents. )  
17

18 Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding  
19 of probable cause pursuant to Government Code Section 83115.5, alleges the following:

20 **JURISDICTION**

21 1. Complainant is the Enforcement Division of the Fair Political Practices Commission (the  
22 “Commission”) and makes this Accusation in its official capacity and in the public interest.

23 2. The authority to bring this action is derived from Title 2, California Code of Regulations,  
24 Sections 18361 and 18361.4, subdivision (g), and the statutory law of the State of California,  
25 specifically including, but not limited to, Government Code Sections 83111, 83116, and 91000.5,  
26 which assign to the Enforcement Division the duty to administer, implement, and enforce the  
27 provisions of the Political Reform Act, found at Government Code Sections 81000 through 91014.  
28



1 **APPLICABLE LAW**

2 8. All applicable law in this Accusation is the law as it existed during the relevant time for  
3 the violations alleged.

4 **Committee**

5 9. Under the Act, “committee” means any person or combination of persons who directly or  
6 indirectly receives contributions totaling \$2,000 or more in a calendar year.<sup>6</sup> This type of committee  
7 is known as a recipient committee.

8 10. A “primarily formed committee” means a recipient committee which is formed or exists  
9 primarily to support or oppose any of the following: a single candidate; a single measure; a group of  
10 specific candidates being voted upon in the same city, county, or multicounty election; or two or  
11 more measures being voted upon in the same city, county, multicounty, or state election.<sup>7</sup> A  
12 recipient committee is considered to be “formed or existing primarily to support or oppose” a  
13 candidate or measure if the committee’s primary purpose and activities are to support or oppose  
14 candidates or measures, or if the committee makes more than 70% of its total contributions and  
15 expenditures on all candidates and measures on those specific candidates or measures during the  
16 relevant time period.<sup>8</sup> Within 30 days of the designation of the numerical order of propositions  
17 appearing on the ballot, any committee which is primarily formed to support or oppose a ballot  
18 measure shall, if supporting the measure, include the statement, “a committee for Proposition \_\_,”  
19 in any reference to the committee required by law.<sup>9</sup>

20 **Duty to File and Amend Statement of Organization**

21 11. A recipient committee must file a statement of organization within 10 days of the  
22 committee reaching the \$2,000 threshold.<sup>10</sup> The statement is required to include the name of the  
23 committee.<sup>11</sup> If there is a change to any of the information contained in the statement of  
24 organization, an amendment shall be filed within 10 days to reflect the change.<sup>12</sup>

25 <sup>6</sup> Section 82013, subdivision (a).

26 <sup>7</sup> Section 82047.5

27 <sup>8</sup> Regulation 18247.5, subd. (c)(3).

28 <sup>9</sup> Section 84017.

<sup>10</sup> Section 84101.

<sup>11</sup> Section 84102.

<sup>12</sup> Section 84103, subd (a).

1 Duty to File Campaign Statements

2 12. The Act requires committees and treasurers to file campaign statements and reports at  
3 specific times disclosing information regarding contributions received and expenditures made by  
4 the campaign committees.<sup>13</sup> If the filing due date for a statement or report falls on a Saturday,  
5 Sunday, or official state holiday, then the filing due date shall be extended to the next regular  
6 business day.<sup>14</sup> This extension does not apply to 24-hour contribution reports when the due date for  
7 these reports falls on a Saturday, Sunday, or official state holiday immediately prior to an  
8 election.<sup>15</sup>

9 Duty to File Pre-Election Campaign Statements

10 13. Primarily formed committees to support or oppose a measure appearing on the ballot to  
11 be voted on at the next election shall file pre-election campaign statements.<sup>16</sup>

12 14. The first pre-election campaign statement, for the period ending in 45 days before the  
13 election, shall be filed no later than 40 days before the election.<sup>17</sup> Committees must file a second  
14 pre-election statement for the reporting period ending 17 days before the election no later than 12  
15 days before the election.<sup>18</sup> If the person has not previously filed a campaign statement, the period  
16 covered begins on January 1.<sup>19</sup>

17 15. For the November 6, 2018 General Election, committees were required to file the first pre-  
18 election campaign statement for the period of July 1, 2018 to September 22, 2018, no later than  
19 September 27, 2018. Committees were also required to file the second pre-election campaign  
20 statement for the period September 23, 2018 to October 20, 2018, no later than October 25, 2018.

21 Duty to File Semiannual Campaign Statements

22 16. A committee must file semi-annual campaign statements beginning in the period in  
23 which the committee qualified and continuing until the committee terminates.<sup>20</sup> A committee must  
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25 <sup>13</sup> See Section 84200, *et seq.*

26 <sup>14</sup> Regulation 18116, subd. (a).

27 <sup>15</sup> Regulation 18116, subd. (b).

28 <sup>16</sup> Section 84200.5, subd. (a).

<sup>17</sup> Section 84200.8, subd. (a).

<sup>18</sup> Section 84200.8, subd. (b).

<sup>19</sup> Section 842046, subd. (b).

<sup>20</sup> Section 84200, subd. (a).

1 file a semi-annual statement by January 31 for the period ending December 31 of the previous year,  
2 and by July 31 for the period ending June 30.<sup>21</sup> Whenever the deadline falls on a Saturday, Sunday  
3 or official state holiday, the filing deadline for a statement shall be extended to the next regular  
4 business day.<sup>22</sup>

#### 5 Duty to file 24-Hour Contribution Reports

6 17. Under the Act, a “late contribution” includes a contribution that totals in the aggregate  
7 \$1,000 or more and is made to or received by a candidate, a controlled committee, or a committee  
8 formed or existing primarily to support or oppose a candidate or measure during the 90-day period  
9 preceding the date of the election, or on the date of the election, at which the candidate or measure  
10 is to be voted on.<sup>23</sup> Each candidate or committee that makes or receives a late contribution shall  
11 report the late contribution within 24 hours of the time it is made or received.<sup>24</sup>

#### 12 Duty to Report Contributor Information

13 18. The Act requires committees to report on campaign statements the following  
14 information about a person who makes, in the aggregate, contributions of \$100 or more: (1) full  
15 name; (2) street address; (3) occupation; (4) employer, or if self-employed, the name of the  
16 contributor’s business; (5) the date and amount of each contribution received from the contributor  
17 during the reporting period; and (6) the cumulative amount of contributions received from the  
18 contributor.<sup>25</sup>

#### 19 Recordkeeping

20 19. It is the duty of each committee treasurer to maintain detailed accounts, records, bills,  
21 and receipts necessary to prepare campaign statements and to establish that campaign statements  
22 were properly filed.<sup>26</sup> This duty includes the maintenance of detailed information and original  
23 source documentation for a period of four years following the date the campaign statement to which  
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26 <sup>21</sup> Section 84200

<sup>22</sup> Regulation 18116, subd. (a)

27 <sup>23</sup> Section 82036, subd. (a).

<sup>24</sup> Section 84203.

28 <sup>25</sup> Section 84211, subd. (f).

<sup>26</sup> Section 84104.



1 they relate is filed.<sup>27</sup> Examples of original source documentation that must be maintained include  
2 copies of bills, receipts, and invoices for expenditures of \$25 or more.<sup>28</sup>

3 Prohibition Against Cash Contributions and Expenditures of \$100 or More

4 20. No contribution of \$100 or more may be made or received in cash.<sup>29</sup> All contributions of  
5 \$100 or more must be made in the form of a written instrument containing the name of the  
6 contributor and the name of the payee and drawn from the account of the contributor.<sup>30</sup>

7 21. The Act further prohibits making an expenditure of \$100 or more in cash.<sup>31</sup> The Act  
8 defines “expenditure: as a payment, forgiveness of a loan, payment of a loan by a third party, or an  
9 enforceable promise to make payment, unless it is clear from the surrounding circumstances that it  
10 is not made for political purposes.<sup>32</sup>

11 Joint and Several Liability of Principal Officer, Treasurer and Committee

12 22. Every committee must have a treasurer.<sup>33</sup> Committees must also identify a principal  
13 officer.<sup>34</sup> This individual is primarily responsible for approving the political activities of the  
14 committee, including, but not limited to, authorizing the content of communications, authorizing  
15 expenditures, including contributions, on behalf of the committee, and determining the committee’s  
16 campaign strategy.<sup>35</sup> It is the duty of the treasurer and the principal officer to ensure that the  
17 committee complies with all the requirements of the Act.<sup>36</sup>

18 23. The treasurer may designate one assistant treasurer on the committee's statement of  
19 organization. The assistant treasurer may sign and verify campaign statements on behalf of the  
20 committee which the assistant treasurer has used reasonable diligence to prepare and review, and  
21 signs to that effect under penalty of perjury as required by Government Code section 81004.<sup>37</sup>

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23 <sup>27</sup> Regulation 18401, subd. (b)(2).

24 <sup>28</sup> Regulation 18401, subd. (a)(4).

25 <sup>29</sup> Section 84300, subd. (a).

26 <sup>30</sup> Section 84300, subd. (c).

27 <sup>31</sup> Section 84300, subd. (b).

28 <sup>32</sup> Section 82025.

<sup>33</sup> Section 84100.

<sup>34</sup> Section 84102, subd. (c).

<sup>35</sup> Section 82047.6.

<sup>36</sup> Sections 81004, 84100, 84104, and 84213, and Regulation 18427.

<sup>37</sup> Regulation 18426.1.

1 24. For campaign reporting/filing obligations, the treasurer and the principal officer are  
2 liable, along with the committee, for violations of the Act.<sup>38</sup> If two or more persons are responsible  
3 for any violation, they shall be held jointly and severally liable.<sup>39</sup> With respect to statements signed  
4 by the assistant treasurer, the treasurer and assistant treasurer shall be jointly and severally liable for  
5 any violations for which the Political Reform Act would otherwise hold the treasurer liable.<sup>40</sup>

### 6 GENERAL FACTS

7 25. Kern Neighborhoods was created in 2018, which consisted of a group of activists who  
8 support marijuana-related policy issues in both Kern County and the City of Bakersfield.

9 26. Kern Neighborhoods filed its initial Form 410 with the Secretary of State (“SOS”) and  
10 Kern County on September 19, 2018, identifying as a primarily formed ballot measure committee in  
11 support of Measure J.

12 27. At the relevant time periods, Larry Hiestand was the named treasurer. However, the  
13 evidence shows that Tim Blakeley, who served as the assistant treasurer and principal officer, acted  
14 as Kern Neighborhoods’ treasurer and signed all campaign statements.

15 28. During the relevant time periods, Kern Neighborhoods committed numerous violations of  
16 the Act including failing to timely file campaign statements, receiving cash contributions over \$100,  
17 failing to report contributor information, failing to maintain adequate records, and making  
18 expenditures over \$100 in cash. Ultimately, the lack of records precluded the Enforcement Division  
19 from determining if other violations of the Act occurred.

#### 20 Failure to Timely File the Statement of Organization

21 29. A recipient committee must file a statement of organization within 10 days of reaching  
22 the \$2,000 threshold.<sup>41</sup> Kern Neighborhoods filed its initial Form 410 with SOS on September 19,  
23 2018 indicating the date of qualification was April 16, 2018. Records provided by Blakeley  
24 confirmed the date of qualification was April 16, 2018. Kern Neighborhoods was required to file its

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27 <sup>38</sup> Section 83116.5 and Regulation 18316.6.

<sup>39</sup> Sections 83116.5 and 91006.

<sup>40</sup> *Ibid.*

<sup>41</sup> Section 84101.

1 statement of organization no later than April 26, 2018. Therefore, Kern Neighborhoods did not  
2 timely file its statement of organization.

3 Failure to Timely File Campaign Statements

4 30. Kern Neighborhoods, as a primarily formed committee in support of Measure J, was  
5 required to timely file pre-election campaign statements.<sup>42</sup> A review of the campaign statements  
6 during the relevant period confirmed more than 70% of its total contributions and expenditures  
7 were made on Measure J.

8 31. The first campaign statement filed by Kern Neighborhoods in Kern County was the first  
9 pre-election statement covering the period of January 1, 2018 to September 22, 2018. The statement  
10 was filed on October 11, 2018, 15 days late.

11 32. Based on the reported date of qualification as well as contributions reported as early as  
12 April 16, 2018 on the pre-election statement, Kern Neighborhoods was required to file a semi-  
13 annual statement covering the period of January 1, 2018 through June 30, 2018 by the July 31, 2018  
14 due date. Therefore, the pre-election statement filed by Kern Neighborhoods was required to cover  
15 the period of July 1, 2018 through September 22, 2018, instead of January 1, 2018 through  
16 September 22, 2018. Kern Neighborhoods then timely filed its second pre-election statement  
17 covering the period of September 23, 2018 through October 10, 2018.

18 33. Kern Neighborhoods filed a termination semiannual campaign statement covering the  
19 period of October 21, 2018 through January 31, 2019 on February 14, 2019, with a termination date  
20 of November 13, 2018. This statement should have covered the period of October 21, 2018 through  
21 November 13, 2018 and was due no later than January 31, 2019. Therefore, this statement was  
22 untimely filed. The following is a summary of the late and missing filings:

23

Type	Period Covered	Date Filed	Due	Days Late
Form 410	N/A	9/19/18	4/26/18	146
Semi-Annual	1/1/18 to 6/30/18	Not Filed	7/31/18	N/A

24  
25  
26  
27

28 <sup>42</sup> Section 84200.5, subd. (a).

1	1 <sup>st</sup> Pre-election	7/1/18 to 9/22/18 <sup>43</sup>	10/11/18	9/27/18	15
2					
3	2 <sup>nd</sup> Pre-election	9/23/18/ to 10/20/18	10/23/18	10/25/18	0
4	Semi-Annual	10/21/18 to	2/14/19	1/31/19	14
5		12/31/18 <sup>44</sup>			

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7 Failure to Timely File 24-Hour Contribution Report

8           34. On the second pre-election campaign statement covering the period of September 23,  
9 2018 through October 20, 2018, Kern Neighborhoods reported a contribution in the amount of  
10 \$1,217 from Vape and Bake received on October 17, 2018. Since the contribution was over \$1,000,  
11 it required a 24-hour contribution report to be filed by October 18, 2018. According to filing officer  
12 records in Kern County, Kern Neighborhoods failed to timely file the required 24-hour contribution  
13 report.

14 Failure to Report Contributor Information

15           35. The Act requires committees reporting on campaign statements to include the date and  
16 amount of each contribution received from the contributor during the reporting period and the  
17 cumulative amount of contributions received from the contributor.

18           36. On the campaign statement for the reporting period of January 1, 2018 through  
19 September 22, 2018, Kern Neighborhoods reported several contributions over \$1,000, with  
20 contribution amounts ranging from \$2,000 to \$83,120.

21           37. In the “date received” section of Schedule A of that campaign statement, Kern  
22 Neighborhoods cited date ranges for the contributions, instead of the specific date each contribution  
23 was made and the cumulative total from the contributor. Therefore, Kern Neighborhoods failed to  
24 timely report all contributor information, as required.

25 Failure to Maintain Adequate Campaign Records

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28 <sup>43</sup> Instead of filing for the period covering July 1, 2018 to September 22, 2018, Kern Neighborhoods dated the statement January 1, 2018 to September 22, 2018.

<sup>44</sup> The filed statement covered a broader reporting period of October 21, 2018 to January 31, 2019.

1           38. Adequate records were not maintained for all reported contributions totaling \$203,287  
2 and expenditures totaling \$202,342. On February 6, 2019, the Enforcement Division requested all  
3 records from Kern Neighborhoods, including but not limited to bank statements, copies of  
4 contributor checks, deposit slips, and all invoices for Kern Neighborhoods. Responsive materials to  
5 the records request failed to substantiate Kern Neighborhoods' campaign activity.

6           39. Additionally, on March 18, 2019, a subpoena was issued to the Kern Neighborhoods  
7 campaign bank account requesting relevant records for the reporting period of January 1, 2018  
8 through December 31, 2018. Responsive materials to the subpoena revealed three transactions  
9 through the campaign bank account, as detailed subsequently.

10           40. Hiestand, in an interview with FPPC Special Investigator Kaitlin Osborn, was asked  
11 whether he maintained any of the Kern Neighborhoods' records. Hiestand stated he did not have  
12 any records for Kern Neighborhoods. Importantly, all campaign statements reflect that Blakeley, the  
13 assistant treasurer, signed all statements for Kern Neighborhoods.

14           41. Blakeley, during his recorded interview with Osborn on September 15, 2022, was asked  
15 to provide records for Kern Neighborhoods. He stated he maintained some records for Kern  
16 Neighborhoods in 2018, which he kept in a record book. Blakeley indicated when the Enforcement  
17 Division requested records on February 6, 2019, Blakeley was unable to locate the record book.  
18 However, since then, he was able to locate it. Blakeley described the record book as a handwritten  
19 cash ledger of all payments received with information regarding when and from whom payments  
20 were received.

21           42. Blakeley provided Osborn with photos of an incomplete cash ledger after the recorded  
22 interview. The cash ledger consisted of pages titled "KCPR spreadsheet," "Cash Receipts Paid to  
23 Coordinators" and "Cash Out Receipt Banked." The first two pages also had a column titled "\$ for  
24 Signatures" with a list of names and local dispensaries under it. The third page, "Cash Out Receipt  
25 Banked" had a similar column titled "\$ for association."

26           43. The book contained some information on advertising expenses and other hand-written  
27 notations pertaining to the financial activity of Kern Neighborhoods. The cash ledger pages also  
28 contained notes in the margins with what appeared to be totals. The totals listed, however, did not

1 match the amounts listed on other pages. No additional invoices, receipts, or records were produced  
2 to support the Committee's contributions or expenditures.

3 44. During the interview, records specifically related to advertisements produced by Kern  
4 Neighborhoods in support of Measure J were requested. According to Blakeley, some advertising  
5 was paid for directly by various collectives as non-monetary contributions. Other than the cash  
6 ledger, no additional invoices, receipts, or records were produced to support these payments or  
7 confirm details about any advertisements.

8 45. In summary, the records Blakeley provided failed to substantiate the campaign  
9 statements and their accuracy. The cash ledger photos and the campaign bank account statements do  
10 not provide a clear record of contributions received and expenditures made by Kern  
11 Neighborhoods.

12 46. The lack of records precluded the Enforcement Division from confirming all reported  
13 contributions and expenditures. The lack of records also precluded the Enforcement Division from  
14 determining any other violations of the Act, including, but not limited to, failure to accurately report  
15 contributions, expenditures, and sub-vendor information, failure to timely file additional 24-hour  
16 contribution reports, advertisement disclosure violations, money laundering, and misuse of  
17 campaign funds.

#### 18 Improper Cash Contributions and Expenditures

19 47. Kern Neighborhoods reported receiving contributions totaling \$203,287 and making  
20 expenditures totaling \$202,342 solely with cash.

21 48. During Blakeley's recorded interview with Osborn, Blakeley stated he collected  
22 contributions by going to various dispensary locations in person to collect envelopes of money. The  
23 envelopes contained the cash contributions. When asked approximately how much cash was  
24 collected Blakeley explained it was "quite a bit, thousands and thousands, tens of thousands."  
25 Blakeley summarized that it was "a lot of money over a lot of time." Blakeley stated once he  
26 received the cash, he did not deposit the cash contributions into the bank account for Kern  
27 Neighborhoods.  
28

1           49. A review of Kern Neighborhoods’ bank account confirmed that contributions were not  
2 deposited into the Committee’s bank account. The bank account showed three transactions. On  
3 October 15, 2018, two deposits were made at Family Dollar, the first for \$400 and the second for  
4 \$300. On October 16, 2018, a transaction was made to Intermarket Manufacturer for \$608. The lack  
5 of deposits in the bank account supports the claim Kern Neighborhoods worked primarily in cash.

6           50. After the cash was picked up by Blakeley, Blakeley stated the cash was brought directly  
7 to Phillip Ganong’s (“Ganong”) law office. Blakeley further stated Ganong then distributed the cash  
8 at his law office and that most of the cash, if not all, was used for signature canvassers.

9           51. However, Blakeley stated he had no documents, other than the cash ledger, to show what  
10 the cash was used for. Blakeley stated Mike Myers (“Myers”) received some of the cash envelopes  
11 directly but other than Myers, he never physically saw where the money went after it was dropped  
12 off at Ganong’s law office. Myers was listed as receiving \$189,211 on the Committee’s campaign  
13 statement during the reporting period of January 1, 2018 to September 22, 2018.

14           52. On December 29, 2022, Heather Iriart (“Iriart”), a proponent of both Measure J and an  
15 active member of the other committee mentioned, KCPR, confirmed with Special Investigator  
16 Osborn that Kern Neighborhoods collected contributions in cash.

17           53. During her recorded interview, Iriart stated the Measure J committee “was working with  
18 straight cash.” In a subsequent, non-recorded interview with Osborn on January 5, 2023, Iriart  
19 confirmed the information Blakeley stated. Iriart reiterated cash was received and “people were  
20 paid out in cash.” She stated cash was dropped off at Ganong’s law office and kept in a safe  
21 overnight because “it was too much cash to carry around.”

22           54. Iriart additionally stated several people, including herself, had access to the safe, and  
23 that cash was exchanged at Ganong’s office between parties. However, Iriart could not provide  
24 additional information regarding how the cash was distributed after it was dropped off at Ganong’s  
25 law office.

26           55. Below is a chart of all reported contributions received in cash to Kern Neighborhoods,  
27 totaling \$202,387:

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2	Statement Period	Date <sup>45</sup>	Name/Contributor	Contribution Amount
3	1/1/18 to 9/22/18	4/16/18 to 7/17/18	Antelope Valley Diamond Collective	\$55,250
4	1/1/18 to 9/22/18	4/16/18 to 8/1/18	Tanner Vest Collective	\$83,120
5	1/1/18 to 9/22/18	5/6/18 to 8/2/18	Plum Tree Collective	\$29,000
6	1/1/18 to 9/22/18	6/5/18 to 9/9/18	Vape and Bake	\$10,900
7	1/1/18 to 9/22/18	6/5/18 to 9/9/18	County Line Organics	\$10,900
8	1/1/18 to 9/22/18	5/26/18 to 5/30/18	Organic Health Solutions	\$6,000
9	1/1/18 to 9/22/18	5/14/18	Big O Relief	\$2,000
10	1/1/18 to 9/22/18	4/16/18 to 5/1/18	Therapeutic Health Center	\$4,000
11	9/23/18 to 10/20/18	10/17/18	Vape and Bake	\$1,217

12 56. Below is a chart of all reported expenditures made in cash by Kern Neighborhoods, totaling \$202,342:

13	Statement Period	Name of Payee	Description of Payment	Expenditure Amount
14	1/1/18 to 9/22/18	Mike Myers	For signature gathering to get initiative on ballot	\$189, 211
15	1/1/18 to 9/22/18	Vape and Bake	Billboards and Shirts Yes on J	\$6,857
16	1/1/18 to 9/22/18	Tanner Vest Collective	Billboards Yes on J	\$5,057
17	1/1/18 to 9/22/18	Vape and Bake	Yard Signs	\$1,217

18 **PROCEDURAL HISTORY**

19 57. The Enforcement Division initiated an administrative action against Kern Neighborhoods and Blakeley in this matter by serving a packet containing a cover letter, a Report in Support of a Finding of Probable Cause (“PC Report”), a fact sheet regarding probable cause proceedings, selected sections of the Government Code regarding probable cause proceedings for the Commission, and selected regulations of the Commission regarding probable cause proceedings.

20 58. Blakeley was served with the PC Report, individually and on behalf of Kern Neighborhoods, via personal service on April 12, 2023. The information contained in the PC Report packet advised Kern Neighborhoods and Blakeley that they had 21 days in which to request a probable cause conference, file a written response to the PC Report, or both. During the 21 days that followed

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28 <sup>45</sup> Kern Neighborhoods failed to report specific dates of contributions, but instead reported contributions in lump sums with corresponding date ranges.



1 the service of the PC Report, Kern Neighborhoods and Blakeley did not file a response to the PC  
2 Report or request a probable cause conference.

3 59. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an  
4 Accusation Be Prepared and Served (“Ex Parte Request”), dated February 8, 2024, the Enforcement  
5 Division submitted the matter to the Hearing Officer for a determination of probable cause.

6 60. On or about February 9, 2024, the Hearing Officer issued an order finding, based on the  
7 Ex Parte Request and the PC Report, that there was probable cause to believe Kern Neighborhoods  
8 and Blakeley violated the Act and directed the Enforcement Division to issue an Accusation against  
9 Kern Neighborhoods and Blakeley in accordance with the finding.

### 10 **VIOLATIONS**

11 61. Kern Neighborhoods and Blakeley committed fourteen violations of the Act as follows:

#### 12 **Count 1**

##### 13 **Failure to Timely File an Amendment to Statement of Organization**

14 62. Complainant incorporates paragraphs 1 – 63 of this Accusation, as though completely set  
15 forth here.

16 63. Kern Neighborhoods and Blakeley had a duty to timely file an amended statement of  
17 organization to report the Committee’s date of qualification by the April 26, 2018 due date.

18 64. Kern Neighborhoods and Blakeley failed to timely file an amended statement of  
19 organization to report the Committee’s date of qualification.

20 65. By failing to file an amended statement of organization by the April 26, 2018 due date,  
21 Kern Neighborhoods and Blakeley violated Government Code Section 84101, subdivision (a).

#### 22 **Count 2**

##### 23 **Failure to Timely File a Semiannual Campaign Statement**

24 66. Complainant incorporates paragraphs 1 – 67 of this Accusation, as though completely set  
25 forth here.

26 67. Kern Neighborhoods and Blakeley had a duty to timely file a semiannual campaign  
27 statement for the reporting period of January 1, 2018 through June 30, 2018 by the July 31, 2018 due  
28 date.



1 **Count 5**

2 **Failure to Timely File a Semiannual Campaign Statement**

3 78. Complainant incorporates paragraphs 1 – 79 of this Accusation, as though completely set  
4 forth here.

5 79. Kern Neighborhoods and Blakeley had a duty to timely file a semiannual campaign  
6 statement for the reporting period of October 21, 2018 through December 31, 2018 by the January  
7 31, 2019 due date.

8 80. Kern Neighborhoods and Blakeley failed to file a semiannual campaign statement for the  
9 reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date.

10 81. By failing to file the semiannual campaign statement by January 31, 2019, Kern  
11 Neighborhoods and Blakeley violated Government Code Section 84200, subdivision (a).

12 **Count 6**

13 **Failure to Timely File a 24-Hour Contribution Report**

14 82. Complainant incorporates paragraphs 1 – 83 of this Accusation, as though completely set  
15 forth here.

16 83. Kern Neighborhoods and Blakeley had a duty to timely file a 24-hour contribution report  
17 for a \$1,217 contribution received on October 17, 2018, due on October 18, 2018.

18 84. Kern Neighborhoods and Blakeley failed to file a 24-hour contribution report for a  
19 \$1,217 contribution received on October 17, 2018, by October 18, 2018.

20 85. By failing to file the 24-hour contribution report by October 18, 2018, Kern  
21 Neighborhoods and Blakeley violated Government Code Section 84203.

22 **Count 7**

23 **Failure to Report Contributor Information**

24 86. Complainant incorporates paragraphs 1 – 87 of this Accusation, as though completely set  
25 forth here.

26 87. Kern Neighborhoods and Blakeley had a duty to accurately report the date contributions  
27 were received on the pre-election campaign statement for the reporting period of July 1, 2018 to  
28 September 22, 2018.

1 88. Kern Neighborhoods and Blakeley failed to report the date of each contribution on the  
2 pre-election campaign statement for the reporting period of July 1, 2018 to September 22, 2018.

3 89. By failing to report the date of each contribution on the pre-election campaign statement  
4 for the reporting period of July 1, 2018 to September 22, 2018, Kern Neighborhoods and Blakeley  
5 violated Government Code Section 84211, subdivision (f).

6 **Count 8**

7 **Failure to Keep Accurate Records**

8 90. Complainant incorporates paragraphs 1 – 91 of this Accusation, as though completely set  
9 forth here.

10 91. Kern Neighborhoods and Blakeley had a duty to maintain detailed campaign records for  
11 contributions received and expenditures made during the reporting period of January 1, 2018 through  
12 June 31, 2018.

13 92. Kern Neighborhoods and Blakeley failed to maintain detailed campaign records for  
14 contributions received and expenditures made during the reporting period of January 1, 2018 through  
15 June 31, 2018.

16 93. By failing to maintain detailed campaign records for contributions received and  
17 expenditures made during the reporting period of January 1, 2018 through June 31, 2018, Kern  
18 Neighborhoods and Blakeley violated Government Code Section 84104.

19 **Count 9**

20 **Failure to Keep Accurate Records**

21 94. Complainant incorporates paragraphs 1 – 95 of this Accusation, as though completely set  
22 forth here.

23 95. Kern Neighborhoods and Blakeley had a duty to maintain detailed campaign records for  
24 contributions received and expenditures made during the reporting period of July 1, 2018 through  
25 September 22, 2018.

26 96. Kern Neighborhoods and Blakeley failed to maintain detailed campaign records for  
27 contributions received and expenditures made during the reporting period of July 1, 2018 through  
28 September 22, 2018.

1           97. By failing to maintain detailed campaign records for contributions received and  
2 expenditures made during the reporting period of July 1, 2018 through September 22, 2018, Kern  
3 Neighborhoods and Blakeley violated Government Code Section 84104.

4   **Count 10**

5   **Failure to Keep Accurate Records**

6           98. Complainant incorporates paragraphs 1 – 99 of this Accusation, as though completely set  
7 forth here.

8           99. Kern Neighborhoods and Blakeley had a duty to maintain detailed campaign records for  
9 contributions received and expenditures made during the reporting period of September 23, 2018  
10 through October 20, 2018.

11           100.         Kern Neighborhoods and Blakeley failed to maintain detailed campaign records  
12 for contributions received and expenditures made during the reporting period of September 23, 2018  
13 through October 20, 2018.

14           101.         By failing to maintain detailed campaign records for contributions received and  
15 expenditures made during the reporting period of September 23, 2018 through October 20, 2018,  
16 Kern Neighborhoods and Blakeley violated Government Code Section 84104.

17   **Count 11**

18   **Failure to Keep Accurate Records**

19           102.         Complainant incorporates paragraphs 1 – 103 of this Accusation, as though  
20 completely set forth here.

21           103.         Kern Neighborhoods and Blakeley had a duty to maintain detailed campaign  
22 records for contributions received and expenditures made during the reporting period of October 21,  
23 2018 through December 31, 2018.

24           104.         Kern Neighborhoods and Blakeley failed to maintain detailed campaign records  
25 for contributions received and expenditures made during the reporting period of October 21, 2018  
26 through December 31, 2018.



1           115.       Kern Neighborhoods and Blakeley were prohibited from making cash  
2 expenditures of \$100 or more.

3           116.       Kern Neighborhoods and Blakeley made cash expenditures of \$100 or more  
4 during the reporting period of July 1, 2018 through September 22, 2018.

5           117.       By making cash expenditures of \$100 or more, Kern Neighborhoods and Blakeley  
6 violated Government Code Section 84300, subdivision (a).

7                           **MITIGATING OR EXCULPATORY FACTORS**

8           118.       Although Kern Neighborhoods filed the first pre-election campaign statement  
9 late, it was filed prior to the relevant election. Additionally, the second pre-election campaign  
10 statement was timely filed.

11           119.       Blakeley was cooperative with the Enforcement Division during the investigation.

12                           **AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS**

13           120.       As part of his interview with Osborn, Hiestand was asked again whether he  
14 maintained any of Kern Neighborhoods' records. Hiestand stated he was put on the Kern  
15 Neighborhoods campaign forms as the treasurer without his consent and never agreed to the  
16 position. Hiestand stated he did not have any records for Kern Neighborhoods. Blakeley confirmed  
17 this information during the course of the investigation and confirmed he, not Hiestand, signed all  
18 campaign statements for Kern Neighborhoods.

19                           **PRAYER**

20 WHEREFORE, Complainant prays as follows:

- 21           1.       That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and  
22 Regulation 18361.5, and at such hearing find that Kern Neighborhoods and Blakeley  
23 violated the Act as alleged herein;
- 24           2.       That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
25 order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
26 violation of the Political Reform Act alleged in **Count 1**;
- 27  
28

- 1           3.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
2           order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
3           violation of the Political Reform Act alleged in **Count 2**;
- 4           4.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
5           order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
6           violation of the Political Reform Act alleged in **Count 3**;
- 7           5.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
8           order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
9           violation of the Political Reform Act alleged in **Count 4**;
- 10          6.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
11          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
12          violation of the Political Reform Act alleged in **Count 5**;
- 13          7.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
14          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
15          violation of the Political Reform Act alleged in **Count 6**;
- 16          8.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
17          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
18          violation of the Political Reform Act alleged in **Count 7**;
- 19          9.     That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
20          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
21          violation of the Political Reform Act alleged in **Count 8**;
- 22          10.    That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
23          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
24          violation of the Political Reform Act alleged in **Count 9**;
- 25          11.    That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
26          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
27          violation of the Political Reform Act alleged in **Count 10**;
- 28



- 1           12. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
2           order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
3           violation of the Political Reform Act alleged in **Count 11**;
- 4           13. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
5           order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
6           violation of the Political Reform Act alleged in **Count 12**;
- 7           14. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
8           order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
9           violation of the Political Reform Act alleged in **Count 13**;
- 10          15. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
11          order Kern Neighborhoods and Blakeley to pay a monetary penalty of up to \$5,000 for the  
12          violation of the Political Reform Act alleged in **Count 14**;
- 13          16. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision  
14          (e), consider the following factors in framing a proposed order following a finding of a  
15          violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused  
16          by the specific violation; (2) The level of experience of the violator with the requirements  
17          of the Political Reform Act; (3) Penalties previously imposed by the Commission in  
18          comparable cases; (4) The presence or absence of any intention to conceal, deceive or  
19          mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the  
20          violator demonstrated good faith by consulting the Commission staff or any other  
21          governmental agency in a manner not constituting complete defense under Government  
22          Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and  
23          whether the violator has a prior record of violations of the Political Reform Act or similar  
24          laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed  
25          amendments to provide full disclosure.

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17. That the Fair Political Practices Commission grant such other and further relief as it deems just and proper.

Dated: 4-15-24

*James M. Lindsay*  
James M. Lindsay, Chief of Enforcement  
Fair Political Practices Commission

**Exhibit A-6**

**AFFIDAVIT OF SERVICE**

<b>Case:</b> 18/976	<b>Court:</b> THE FAIR POLITICAL PRACTICES COMMISSION	<b>County:</b>	<b>Job:</b> 10873526
<b>Plaintiff / Petitioner:</b> IN THE MATTER OF: KERN CITIZENS FOR PATIENT RIGHTS		<b>Defendant / Respondent:</b>	
<b>Received by:</b> East Kern Attorney Services		<b>For:</b> CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION	
<b>To be served upon:</b> TIM BLAKELEY and Kern Neighborhoods for Responsible Regulation in Support of Measure J			

I, TAMMY YULE, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

**Recipient Name / Address:** TIM BLAKELEY and Kern Neighborhoods for Responsible Regulation in Support of Measure J, 1809 Jamie Way, Rosamond, CA 93560

**Manner of Service:** Personal/Individual, Apr 23, 2024, 11:50 am PDT

**Documents:** ACCUSATION FPPC 18/976 (Received Apr 15, 2024)

**Additional Comments:**


1) Unsuccessful Attempt: Apr 16, 2024, 5:15 pm PDT at 1809 Jamie Way, Rosamond, CA 93560  
no movement, sounds or answer. a Pt cruiser 5BZY0890 and Kia Soul 7PAU472 in front of the house/driveway

2) Unsuccessful Attempt: Apr 18, 2024, 4:48 pm PDT at 1809 Jamie Way, Rosamond, CA 93560  
No answer. Tv inside on. Same Kia soul in the driveway.

3) Unsuccessful Attempt: Apr 21, 2024, 7:55 am PDT at 1809 Jamie Way, Rosamond, CA 93560  
No answer. No movement or sounds. PT cruiser and Kia Soul out front.

4) Successful Attempt: Apr 23, 2024, 11:50 am PDT at 1809 Jamie Way, Rosamond, CA 93560 received by TIM BLAKELEY and Kern Neighborhoods for Responsible Regulation in Support of Measure J.  
White male 250 pounds 5'7" 40 years old, red hair brown eyes

I declare under the laws of the State of California that the foregoing is true and correct.

  
\_\_\_\_\_  
TAMMY YULE  
# 846

04/23/2024  
\_\_\_\_\_  
Date

East Kern Attorney Services  
P.O. Box 817  
Mojave, CA 93502  
(877) 926-2149

**Exhibit A-7**

**Statement of Organization Recipient Committee**

Statement Type

Initial  
 Not yet qualified  
 or  
 Date qualified as committee

Amendment  
 Termination - See Part 5  
 Date qualified as committee: 04, 16, 18 TB  
 Date of termination: 1/1

In the office of the Secretary of State of the State of California rejected: 9/7, 11 Sep 2018

SEP 19 2018  
 RECEIVED  
 in the office of the Secretary of State of the State of California  
 SEP 06 2018

**CALIFORNIA FORM 410**  
 For Official Use Only  
 R/DJ

NCK

**1. Committee Information** I.D. Number (if applicable) **2. Treasurer and Other Principal Officers**

NAME OF COMMITTEE  
 Kern Neighborhoods for Responsible Regulation *in support of TB Measure "J"*

STREET ADDRESS (NO P.O. BOX)  
 930 Truxtun Ave, suite 213

CITY STATE ZIP CODE AREA CODE/PHONE  
 Bakersfield CA 93301 661-865-4661

MAILING ADDRESS (IF DIFFERENT)  
 1809 Jamie Way Rosamond CA 93560

E-MAIL ADDRESS (REQUIRED) / FAX (OPTIONAL)  
 Tjblakell@gmail.com

COUNTY OF DOMICILE JURISDICTION WHERE COMMITTEE IS ACTIVE  
 Kern County Kern County

NAME OF TREASURER  
 Larry Hiestand

STREET ADDRESS (NO P.O. BOX)  
 14012 Calle Rosales

CITY STATE ZIP CODE AREA CODE/PHONE  
 Bakersfield CA 93314 661-327-2071

NAME OF ASSISTANT TREASURER, IF ANY  
 Tim Blakeley

STREET ADDRESS (NO P.O. BOX)  
 1809 Jamie Way

CITY STATE ZIP CODE AREA CODE/PHONE  
 Rosemond Ca 93560 661-865-4661

NAME OF PRINCIPAL OFFICER(S)  
 Tim Blakeley

STREET ADDRESS (NO P.O. BOX)  
 1809 Jamie Way

CITY STATE ZIP CODE AREA CODE/PHONE  
 Rosamond Ca 93560 661-865-4661

Attach additional information on appropriately labeled continuation sheets.

**3. Verification**

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 9/4/18 By [Signature]  
 DATE SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on \_\_\_\_\_ By \_\_\_\_\_  
 DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on \_\_\_\_\_ By \_\_\_\_\_  
 DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on \_\_\_\_\_ By \_\_\_\_\_  
 DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Clear Page Print

# Statement of Organization Recipient Committee

INSTRUCTIONS ON REVERSE

COMMITTEE NAME Kern Neighborhoods for Responsible Regulation	I.D. NUMBER
---	-------------

- All committees must list the financial institution where the campaign bank account is located.

NAME OF FINANCIAL INSTITUTION Net Spend	AREA CODE/PHONE 877-973-1223	BANK ACCOUNT NUMBER 7000382583619	
ADDRESS P.O. Box 2136	CITY Austin	STATE Tx	ZIP CODE 78768-2136

### 4. Type of Committee Complete the applicable sections.

**Controlled Committee**

- List the name of each controlling officeholder, candidate, or state measure proponent. If candidate or officeholder controlled, also list the elective office sought or held, and district number, if any, and the year of the election.
- List the political party with which each officeholder or candidate is affiliated or check "nonpartisan." Stating "No party preference" is acceptable.
- If this committee acts jointly with another controlled committee, list the name and identification number of the other controlled committee.

NAME OF CANDIDATE/OFFICEHOLDER/STATE MEASURE PROPONENT	ELECTIVE OFFICE SOUGHT OR HELD (INCLUDE DISTRICT NUMBER IF APPLICABLE)	YEAR OF ELECTION	CHECK ONE		PARTY (list political party below)
			Nonpartisan	Partisan	
			<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	

**Primarily Formed Committee**

Primarily formed to support or oppose specific candidates or measures in a single election. List below:

CANDIDATE(S) NAME OR MEASURE(S) FULL TITLE (INCLUDE BALLOT NO. OR LETTER) IF A RECALL, STATE "RECALL" IN FRONT OF THE OFFICEHOLDER'S NAME.	CANDIDATE(S) OFFICE SOUGHT OR HELD OR MEASURE(S) JURISDICTION (INCLUDE DISTRICT NO., CITY OR COUNTY, AS APPLICABLE)	CHECK ONE	
		SUPPORT	OPPOSE
Measure J Kern Medical Cannabis	All districts Kern County	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

Clear Page

Print

**Exhibit A-8**



**Recipient Committee  
Campaign Statement  
Cover Page**

KERN COUNTY ELECTIONS

COVER PAGE

BY _____ Date Stamp	<b>CALIFORNIA FORM 460</b>
2018 OCT 11 AM 11:55	Page _____ of _____ For Official Use Only

Statement covers period  
from 1/1/18  
through 9/22/18

Date of election if applicable:  
(Month, Day, Year)  
11/06/18

SEE INSTRUCTIONS ON REVERSE

**1. Type of Recipient Committee:** All Committees – Complete Parts 1, 2, 3, and 4.

- |  |  |
|--|--|
| <input type="checkbox"/> Officeholder, Candidate Controlled Committee<br><input type="radio"/> State Candidate Election Committee<br><input type="radio"/> Recall<br><small>(Also Complete Part 5)</small> | <input checked="" type="checkbox"/> Primarily Formed Ballot Measure Committee<br><input checked="" type="radio"/> Controlled<br><input type="radio"/> Sponsored<br><small>(Also Complete Part 6)</small> |
| <input type="checkbox"/> General Purpose Committee<br><input type="radio"/> Sponsored<br><input type="radio"/> Small Contributor Committee<br><input type="radio"/> Political Party/Central Committee      | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee<br><small>(Also Complete Part 7)</small>  |

**2. Type of Statement:**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Preelection Statement   | <input type="checkbox"/> Quarterly Statement     |
| <input type="checkbox"/> Semi-annual Statement  | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement<br><small>(Also file a Form 410 Termination)</small> |  |
| <input type="checkbox"/> Amendment (Explain below)  |  |

**3. Committee Information**

I.D. NUMBER  
1411811

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Kern Neighborhoods For Responsible Regulation  
For yes on measure J

STREET ADDRESS (NO P.O. BOX)  
CITY STATE ZIP CODE AREA CODE/PHONE  
Bakersfield CA 93301 661-865-4661

CITY STATE ZIP CODE AREA CODE/PHONE  
Rosamond CA 93560 661-865-4661  
OPTIONAL: FAX / E-MAIL ADDRESS  
tjblake II@gmail.com

**Treasurer(s)**

NAME OF TREASURER  
Larry Hiestand

CITY STATE ZIP CODE AREA CODE/PHONE  
Bakersfield CA 93314 661-327-2071  
NAME OF ASSISTANT TREASURER, IF ANY  
Tim Blake y

CITY STATE ZIP CODE AREA CODE/PHONE  
Rosamond CA 93560 661-865-4661  
OPTIONAL: FAX / E-MAIL ADDRESS  
tjblake II@gmail.com

**4. Verification**

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10/10/18  
Date  
Executed on \_\_\_\_\_  
Date  
Executed on \_\_\_\_\_  
Date  
Executed on \_\_\_\_\_  
Date

By [Signature]  
Signature of Treasurer or Assistant Treasurer  
By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor  
By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent  
By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Exhibit A-9**

**Recipient Committee  
Campaign Statement  
Cover Page**

KERN COUNTY ELECTIONS  
BY \_\_\_\_\_  
Date Stamp

CALIFORNIA FORM **460**

Page \_\_\_\_\_ of \_\_\_\_\_

For Official Use Only

Statement covers period  
from 9/23/18  
through 10/20/18

Date of election if applicable:  
(Month, Day, Year) 2018 OCT 23 AM 11:47  
11/06/18

SEE INSTRUCTIONS ON REVERSE

**1. Type of Recipient Committee:** All Committees – Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
  - State Candidate Election Committee
  - Recall  
(Also Complete Part 5)
- General Purpose Committee
  - Sponsored
  - Small Contributor Committee
  - Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
  - Controlled  
(Also Complete Part 6)
  - Sponsored  
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee  
(Also Complete Part 7)

**2. Type of Statement:**

- Preelection Statement
- Semi-annual Statement
- Termination Statement  
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report

**3. Committee Information**

I.D. NUMBER  
1411811

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Kern Neighborhoods For Responsible Regulation  
For yes on measure J  
STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE  
Bakersfield CA 93301 661-864-4661  
MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE  
Rosamond CA 93560 661-865-4661  
OPTIONAL: FAX / E-MAIL ADDRESS  
tjblakeII@gmail.com

**Treasurer(s)**

NAME OF TREASURER  
Larry Hiestand  
MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE  
Bakersfield CA 93314 661-327-2071  
NAME OF ASSISTANT TREASURER, IF ANY

Tim Blakeley  
MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE  
Rosamond CA 93560 661-865-4661  
OPTIONAL: FAX / E-MAIL ADDRESS  
tjblakeII@gmail.com

**4. Verification**

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10/22/18  
Date

By [Signature]  
Signature of Treasurer or Assistant Treasurer

Executed on \_\_\_\_\_  
Date

By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

Executed on \_\_\_\_\_  
Date

By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent

Executed on \_\_\_\_\_  
Date

By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent

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Print Form

**Exhibit A-10**

**Recipient Committee  
Campaign Statement  
Cover Page**

COVER PAGE

RECEIVED Date Stamp  
BY  
FEB 14 PM 12:07

CALIFORNIA  
FORM **460**

Page 1 of 3  
For Official Use Only

Statement covers period  
from 10/21/18  
through 11/31/18

Date of election if applicable:  
(Month, Day, Year) 2019 FEB 14 PM 12:07  
11/6/18

SEE INSTRUCTIONS ON REVERSE

**1. Type of Recipient Committee:** All Committees - Complete Parts 1, 2, 3, and 4.

- Officeholder, Candidate Controlled Committee
- State Candidate Election Committee
- Recall  
(Also Complete Part 5)
- General Purpose Committee
- Sponsored
- Small Contributor Committee
- Political Party/Central Committee
- Primarily Formed Ballot Measure Committee
- Controlled
- Sponsored  
(Also Complete Part 6)
- Primarily Formed Candidate/Officeholder Committee  
(Also Complete Part 7)

**2. Type of Statement:**

- Preelection Statement
- Semi-annual Statement
- Termination Statement  
(Also file a Form 410 Termination)
- Amendment (Explain below)
- Quarterly Statement
- Special Odd-Year Report

**3. Committee Information**

I.D. NUMBER 1411811

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Kern Neighborhoods For Responsible Regulation  
For yes on measure J  
STREET ADDRESS (NO P.O. BOX)  
1807 Jamie Way  
CITY STATE ZIP CODE AREA CODE/PHONE  
Rosamond CA 93560 661-865-4661  
MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX  
N/A  
CITY STATE ZIP CODE AREA CODE/PHONE  
N/A  
OPTIONAL: FAX / E-MAIL ADDRESS  
TSBlakeII@gmail.com

**Treasurer(s)**

NAME OF TREASURER  
Timothy Blakeley II  
MAILING ADDRESS  
1809 Jamie Way  
CITY STATE ZIP CODE AREA CODE/PHONE  
Rosamond CA 93560 661-865-4661  
NAME OF ASSISTANT TREASURER, IF ANY  
N/A  
MAILING ADDRESS  
N/A  
CITY STATE ZIP CODE AREA CODE/PHONE  
N/A  
OPTIONAL: FAX / E-MAIL ADDRESS  
N/A

**4. Verification**

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 1/13/19  
Date  
Executed on \_\_\_\_\_  
Date  
Executed on \_\_\_\_\_  
Date  
Executed on \_\_\_\_\_  
Date

By [Signature]  
Signature of Treasurer or Assistant Treasurer  
By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor  
By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent  
By \_\_\_\_\_  
Signature of Controlling Officeholder, Candidate, State Measure Proponent

**Exhibit A-11**

**Schedule E  
Payments Made**

Amounts may be rounded  
to whole dollars.

SCHEDULE E

Statement covers period from <u>9/23/18</u> through <u>10/20/18</u>	<b>CALIFORNIA FORM 460</b>
Page _____ of _____	I.D. NUMBER <u>1411811</u>

SEE INSTRUCTIONS ON REVERSE  
NAME OF FILER

Tim Blakeley, Kern Neighborhoods For Responsible Regulation For YES on Measure J

**CODES:** If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- |   |   |   |
|---|---|---|
| CMP ...campaign paraphernalia/misc.                               | MBR member communications                     | RAD radio airtime and production costs                        |
| CNS campaign consultants  | MTG meetings and appearances                  | RFD returned contributions                                    |
| CTB contribution (explain nonmonetary)*                           | OFC office expenses                           | SAL campaign workers' salaries                                |
| CVC civic donations   | PET petition circulating                      | TEL t.v. or cable airtime and production costs                |
| FIL candidate filing/ballot fees                                  | PHO phone banks                               | TRC candidate travel, lodging, and meals                      |
| FND fundraising events  | POL polling and survey research               | TRS staff/spouse travel, lodging, and meals                   |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services  | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense   | PRO professional services (legal, accounting) | VOT voter registration  |
| LIT campaign literature and mailings                              | PRT print ads                                 | WEB information technology costs (internet, e-mail)           |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
<u>Vape and Bake</u>	<u>PRT</u>	<u>yard SIGNS</u>	<u>1217</u>

\* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

**SUBTOTAL \$**

**Schedule E Summary**

- |   |                             |
|---|-----------------------------|
| 1. Itemized payments made this period. (Include all Schedule E subtotals.).....   | \$ <u>1217</u>              |
| 2. Unitemized payments made this period of under \$100.....   | \$ <u>0</u>                 |
| 3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).).....                   | \$ <u>0</u>                 |
| 4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.)..... | <b>TOTAL \$</b> <u>1217</u> |

Clear Sch E

Print Form

**Exhibit A-12**



**Schedule A  
Monetary Contributions Received**

Amounts may be rounded  
to whole dollars.

SCHEDULE A

Statement covers period from <u>4/1/18</u> through <u>9/22/18</u>	<b>CALIFORNIA FORM 460</b>
Page _____ of _____	I.D. NUMBER <u>1411811</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Tim Blakeley, Kern Neighborhoods For Responsible Regulation For yes on Measure J

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
4/16/18- 7/17/18	Antelope Valle v Diamond Collective Rosamond CA 93560	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	55,250	4/16/18- 7/17/18	
4/16/18- 8/1/18	Tanner Vest Collective Rosamond CA 93560	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	83,120	4/16/18- 8/1/18	
5/6/18- 8/2/18	Plum tree collective Rosamond CA 93560	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	29,000	5/6/18- 8/2/18	
6/5/18- 9/9/18	Vape and Bake Rosamond CA 93560	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	10,900	6/5/18- 9/9/18	
6/5/18- 9/9/18	Countv Line Organics Ridgecrest CA 93555	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	10,900	6/5/18- 9/9/18	
				<b>SUBTOTAL \$189,125</b>		

**Schedule A Summary**

- Amount received this period – itemized monetary contributions.  
(Include all Schedule A subtotals.) ..... \$ 201,125
- Amount received this period – unitemized monetary contributions of less than \$100 ..... \$ 0
- Total monetary contributions received this period.  
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.)..... **TOTAL \$** 201,125

\*Contributor Codes  
IND – Individual  
COM – Recipient Committee  
(other than PTY or SCC)  
OTH – Other (e.g., business entity)  
PTY – Political Party  
SCC – Small Contributor Committee

**Schedule A (Continuation Sheet)**  
**Monetary Contributions Received**

Amounts may be rounded  
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period from <u>1/1/18</u> through <u>9/22/18</u>	<b>CALIFORNIA FORM 460</b>
Page _____ of _____	I.D. NUMBER

NAME OF FILER: Tim Blakeley Kern Neighborhoods For Responsible Regulation For yes on measure J I.D. NUMBER: 1411811

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
5/25/18- 5/30/18	organic Health Solutions Rosamond CA 93560	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	6,000	5/25/18 - 5/30/18	
5/14/18	Big O Reliefs Mojave CA 93501	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	2,000	5/14/18	
4/16/18- 5/1/18	Therapeutic Health Center Bakersfield CA 93311	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A	4,000	4/16/18 - 5/1/18	
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				

**SUBTOTAL \$** 12,000

\*Contributor Codes  
 IND - Individual  
 COM - Recipient Committee  
       (other than PTY or SCC)  
 OTH - Other (e.g., business entity)  
 PTY - Political Party  
 SCC - Small Contributor Committee

**Exhibit A-13**

**STAPLES®**

# Record Book

2 column

**The Staples® brand 100% Satisfaction Guarantee**

If you are not 100% happy with this Staples® brand product, just return it anytime. It's that easy.

Staples® Brands Group, 500 Staples Drive, Framingham, MA 01702. Manufactured for Staples the Office Superstore, LLC.  
Made in China ©2007 Staples, Inc. All rights reserved.

Model No.

As of 7/18/18

150,250

$$13,000 + 20\% = 18,000 \times 8 = 144,000$$

$$18,000 \times 20\% = 3,600$$

3,000

7,000

151,600

- 150,250  
1,350

16,569

$$16,569 + 20\% = 19,882 \times 8 = 159,062$$

\$159,062

+ 3,976 Jeff  
+ 3,000 Bonus  
+ 7,000 Michelle

\$173,038

- 155,250 Paid

\$17,788



KCPR spreadsheet

For Signatures			
4/16/18	AUDC/TVC - Mike	10000	5000.00 Each
4/16/18	THC - KCPR	2000	
4/20/18	THC - KCPR	4000	2000 Each
4/26/18	AUDC/TVC - Mike	24000	12000 Each
4/26/18	AUDC/TVC - CASH Acct.	10620	
4/28/18	AUDC/TVC - CASH Acct	23500	
4/28/18	Payment to Mike	2000	
5/1/18	THC - CASH Acct	15000	
5/4/18	AUDC/TVC - CASH Acct	15000	
5/4/18	* Payment to Michelle	5000 -	
5/6/18	Plumb Tree - CASH Acct	2000	
5/14/18	Big O Relief - CASH Acct	7750	
5/14/18	AUDC - CASH Acct	4000	
5/14/18	TVC - CASH Acct	2000	
5/14/18	Plum Tree - CASH Acct	13750	
5/14/18	Payment - Mike	4000/	
5/14/18	Payment - Mike KCPR		

4/27/18	Juan Quattlebaum - signatures \$4	48	
4/27/18	Misty Mayeaux - signatures \$4	148	
4/27/18	Daniel Landras - signatures \$4	172	
4/27/18	Shirley Kimbeth - signatures \$4	80	
4/30/18	Misty Mayeaux - signatures \$4	116	



sheet

to Ech

ach

ach

		\$ for signatures	Cash Receipts Paid To Coordinators.
	5/6/18	Plum tree	5000
	5/25/18	Plum tree	7500
	5/25/18	AVDC	3000
	5/25/18	TVC	5000
	5/28/18	TVC -collectives	14000
	5/25/18	OHS	2000
	5/30/18	Plum tree	2000
	5/30/18	OHS	4000
	5/31/18	TVC	2500
	5/31/18	AVDC	2500
	6/2/18	TVC	10000
	6/4/18	TVC	5000
	6/5/18	AVDC	8000
	6/5/18	Plum tree	1500
	6/5/18	Vape and BAKE	5000
	6/10/18	Plumtree	1500
	6/11/18	Countyline	5000
	6/12/18	Plum tree	1000
	6/15/18	TVC	1000
	6/18/18	Plum Tree	1000
	6/26/18	TVC	1000
	<del>6/26/18</del>	<del>AVDC Double Error (TS) ↓</del>	<del>2000</del>
	6/26/18	AVDC	2000
	7/2/18	PlumTree	1500
	7/2/18	TVC	1000
	7/2/18	AVDC	500
	7/13/18	TVC	1000
	7/17/18	AVDC	500
	8/1/18	TVC	1000
	8/2/18	Plum tree	1000

TVC  
78,12094,000  
As of 7/10/18

Billboards  
TVC 5000  
Vape 1800 + 5000 + 15000 = 2  
County line  
6/14  
4000

10,900  
6 10,114 Billboards  
1800 shirts  

---

11,914



	\$		Cash Receipt
	For Association		out Banked
7/19/18	Plum tree	Fees for startup	700
7/19/18	TVC	Fees for startup	400
7/24/18	Plum tree	Fees for startup	500
7/27/18	Plum tree	Fees for startup	500
7/30/18	Receipt For Tim	PR March-July	1400
8/10/18	OHS	For PR	100
8/10/18	Plum tree	Fee For Corp	1000
8/10/18	Plum tree	For PR	100
8/10/18	AVDC	For PR	100
8/13/18	TVC	For PR	200
8/13/18	AVDC	For PR	1000
8/13/18	AVDC	For PR	100
8/15/18	KMCA	PAC Formation Fee	500

**Exhibit A-14**

**Campaign Disclosure Statement  
Summary Page**

Amounts may be rounded  
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>1/1/18</u> through <u>9/22/18</u>	<b>CALIFORNIA FORM 460</b>
Page _____ of _____	I.D. NUMBER <u>1411811</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Tim Blakeley, Kern Neighbors for Responsible Regulation For Yes on Measure J

**Contributions Received**

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions..... Schedule A, Line 3	\$ <u>201,125</u>	\$ _____
2. Loans Received..... Schedule B, Line 3	<u>N/A</u>	_____
3. SUBTOTAL CASH CONTRIBUTIONS..... Add Lines 1 + 2	\$ <u>201,125</u>	\$ _____
4. Nonmonetary Contributions..... Schedule C, Line 3	<u>N/A</u>	_____
5. TOTAL CONTRIBUTIONS RECEIVED..... Add Lines 3 + 4	\$ <u>201,125</u>	\$ _____

**Calendar Year Summary for Candidates  
Running in Both the State Primary and  
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

**Expenditures Made**

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made..... Schedule E, Line 4	\$ <u>201,125</u>	\$ _____
7. Loans Made..... Schedule H, Line 3	<u>N/A</u>	_____
8. SUBTOTAL CASH PAYMENTS..... Add Lines 6 + 7	\$ <u>201,125</u>	\$ _____
9. Accrued Expenses (Unpaid Bills)..... Schedule F, Line 3	<u>N/A</u>	_____
10. Nonmonetary Adjustment..... Schedule C, Line 3	<u>N/A</u>	_____
11. TOTAL EXPENDITURES MADE..... Add Lines 8 + 9 + 10	\$ <u>201,125</u>	\$ _____

**Expenditure Limit Summary for State  
Candidates**

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)	
Date of Election (mm/dd/yy)	Total to Date
____/____/____	\$ _____
____/____/____	\$ _____

**Current Cash Statement**

12. Beginning Cash Balance..... Previous Summary Page, Line 16	\$ <u>0</u>
13. Cash Receipts..... Column A, Line 3 above	<u>201,125</u>
14. Miscellaneous Increases to Cash..... Schedule I, Line 4	<u>N/A</u>
15. Cash Payments..... Column A, Line 8 above	<u>201,125</u>
16. ENDING CASH BALANCE..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>0</u>

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

\*Amounts in this section may be different from amounts reported in Column B.

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED..... Schedule B, Part 2	\$ <u>0</u>
--	-------------

**Cash Equivalents and Outstanding Debts**

18. Cash Equivalents..... See instructions on reverse	\$ <u>0</u>
19. Outstanding Debts..... Add Line 2 + Line 9 in Column B above	\$ <u>0</u>

**Campaign Disclosure Statement  
Summary Page**

Amounts may be rounded  
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>9/23/18</u> through <u>10/20/18</u>	<b>CALIFORNIA FORM 460</b>
Page _____ of _____	I.D. NUMBER <u>141811</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Tim Blakely, Kern Neighborhoods For Responsible Regulation For Yes on Measure J

**Contributions Received**

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions..... Schedule A, Line 3	\$ <u>1217</u>	\$ _____
2. Loans Received..... Schedule B, Line 3	<u>N/A</u>	_____
3. SUBTOTAL CASH CONTRIBUTIONS..... Add Lines 1 + 2	\$ <u>1217</u>	\$ _____
4. Nonmonetary Contributions..... Schedule C, Line 3	<u>N/A</u>	_____
5. TOTAL CONTRIBUTIONS RECEIVED..... Add Lines 3 + 4	\$ <u>1217</u>	\$ _____

**Calendar Year Summary for Candidates  
Running in Both the State Primary and  
General Elections**

	1/1 through 6/30	7/1 to Date
20. Contributions Received	\$ _____	\$ _____
21. Expenditures Made	\$ _____	\$ _____

**Expenditures Made**

	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made..... Schedule E, Line 4	\$ <u>1217</u>	\$ _____
7. Loans Made..... Schedule H, Line 3	<u>N/A</u>	_____
8. SUBTOTAL CASH PAYMENTS..... Add Lines 6 + 7	\$ <u>1217</u>	\$ _____
9. Accrued Expenses (Unpaid Bills)..... Schedule F, Line 3	<u>N/A</u>	_____
10. Nonmonetary Adjustment..... Schedule C, Line 3	<u>N/A</u>	_____
11. TOTAL EXPENDITURES MADE..... Add Lines 8 + 9 + 10	\$ <u>1217</u>	\$ _____

**Expenditure Limit Summary for State  
Candidates**

**22. Cumulative Expenditures Made\***  
(If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
<u>  /  /  </u>	\$ _____
<u>  /  /  </u>	\$ _____

**Current Cash Statement**

12. Beginning Cash Balance..... Previous Summary Page, Line 16	\$ <u>0</u>
13. Cash Receipts..... Column A, Line 3 above	<u>1217</u>
14. Miscellaneous Increases to Cash..... Schedule I, Line 4	<u>N/A</u>
15. Cash Payments..... Column A, Line 8 above	<u>1217</u>
16. ENDING CASH BALANCE..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>0</u>

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

\*Amounts in this section may be different from amounts reported in Column B.

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED..... Schedule B, Part 2	\$ <u>0</u>
--	-------------

**Cash Equivalents and Outstanding Debts**

18. Cash Equivalents..... See instructions on reverse	\$ <u>0</u>
19. Outstanding Debts..... Add Line 2 + Line 9 in Column B above	\$ <u>0</u>

Clear Summ Pg

Print Form

**Exhibit A-15**

**Schedule E  
Payments Made**

Amounts may be rounded  
to whole dollars.

SCHEDULE E

Statement covers period from <u>1/1/18</u> through <u>9/22/18</u>	<b>CALIFORNIA FORM 460</b>
Page _____ of _____	I.D. NUMBER <u>1411811</u>

SEE INSTRUCTIONS ON REVERSE  
NAME OF FILER

Tim Blakeley, Kern Neighborhoods For Responsible Regulation For YES ON MEASURE J

**CODES:** If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP campaign paraphernalia/misc.	MBR member communications	RAD radio airtime and production costs
CNS campaign consultants	MTG meetings and appearances	RFD returned contributions
CTB contribution (explain nonmonetary)*	OFC office expenses	SAL campaign workers' salaries
CVC civic donations	PET petition circulating	TEL t.v. or cable airtime and production costs
FIL candidate filing/ballot fees	PHO phone banks	TRC candidate travel, lodging, and meals
FND fundraising events	POL polling and survey research	TRS staff/spouse travel, lodging, and meals
IND independent expenditure supporting/opposing others (explain)*	POS postage, delivery and messenger services	TSF transfer between committees of the same candidate/sponsor
LEG legal defense	PRO professional services (legal, accounting)	VOT voter registration
LIT campaign literature and mailings	PRT print ads	WEB information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
<u>Mike Myers 828 Real Rd Bakersfield CA 93309</u>	<u>PET</u>	<u>For Signature Gathering to Get Initiative Approved for Ballot</u>	<u>189,211</u>
<u>VAPC AND Bake</u>	<u>PRT</u>	<u>Billboards And <del>Sign</del> shirts yes on J</u>	<u>6857</u>
<u>Tanner Vest collective</u>	<u>PRT</u>	<u>Billboards yes on J</u>	<u>5,057</u>

\* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

**SUBTOTAL \$ 201,125**

**Schedule E Summary**

1. Itemized payments made this period. (Include all Schedule E subtotals.).....	\$ <u>201,125</u>
2. Unitemized payments made this period of under \$100.....	\$ <u>0</u>
3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).).....	\$ <u>0</u>
4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.).....	<b>TOTAL \$ <u>201,125</u></b>

**Exhibit A-16**



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

August 1, 2024

Tim Blakeley, individually and o/b/o  
Kern Neighborhoods for Responsible Regulation in Support of Measure J  
1809 Jamie Way  
Rosamond, CA 93560

**NOTICE OF DEFAULT DECISION AND ORDER**

**Re: FPPC No. 2018-00976; In the Matter of Kern Neighborhoods for Responsible Regulation in Support of Measure J and Tim Blakeley**

Dear Tim Blakeley:

On April 23, 2024, you were personally served with an accusation in the above-referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**<sup>1</sup>

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default will appear on the published agenda for the Commission’s public meeting on **August 15, 2024**. This agenda will be public and you could be contacted by the media with questions. The Commission will be asked to adopt the default at the subsequent public meeting on **September 19, 2024** and impose an administrative penalty of \$29,000 against you.

Following the issuance of the default, the Commission will obtain a judgment in superior court for the amount owed and then take action to collect the judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

You may still resolve this matter informally by way of a stipulated settlement if an agreement can be reached prior to this matter appearing for consideration by the Commission. Please contact me at (279) 237-5932 or [mcorona@fppc.ca.gov](mailto:mcorona@fppc.ca.gov) if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

*Marissa Corona*

Marissa Corona  
Commission Counsel  
Enforcement Division

---

<sup>1</sup> Government Code section 11505.



**Exhibit A-17**



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

August 29, 2024

Tim Blakeley, individually and o/b/o  
Kern Neighborhoods for Responsible Regulation in Support of Measure J  
1809 Jamie Way  
Rosamond, CA 93560

**NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER**

**Re: FPPC No. 2018-00976; In the Matter of Kern Neighborhoods for Responsible Regulation in Support of Measure J and Tim Blakeley**

Dear Tim Blakeley:

On April 23, 2024, you were personally served with an accusation in the above referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.<sup>1</sup>**

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default appeared on the published agenda for the Commission’s public meeting on August 15, 2024. The Commission will be asked to adopt the default at its public meeting scheduled for **September 19, 2024** and impose an administrative penalty of \$29,000 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on September 19, 2024 is enclosed with this letter.

You may, but you are not required to, provide a response brief, along with any supporting materials, no later than five calendar days before the Commission hearing at which the default is scheduled to be heard. Your response brief must be served on the Commission Assistant, at the above address.

Following the issuance of the default order and imposition of the administrative penalty, we will commence legal proceedings to collect this fine, which may include converting the Commission’s order to a court judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

This letter is your last opportunity to resolve this matter informally by way of a stipulated settlement, before the default proceedings are commenced. If we do not reach a resolution, the enclosed documents will be placed on the Commission’s agenda for the **September 19, 2024** meeting. Please contact me at (279) 237-5932 or [mcorona@fppc.ca.gov](mailto:mcorona@fppc.ca.gov) if you wish to enter into a negotiated settlement.

---

<sup>1</sup> Government Code Section 11505.

Sincerely,

*Marissa Corona*

Marissa Corona  
Commission Counsel  
Enforcement Division

*Enclosures: Default Decision and Order, Exhibit 1 and attachments*