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11 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
12  
13 STATE OF CALIFORNIA

14 In the Matter of ) FPPC No.: 20/950  
15 )  
16 ANNA SONG and FRIENDS OF ANNA )  
17 SONG FOR COUNTY BOARD OF )  
18 EDUCATION FOR 2020, )  
19 Respondents. )  
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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> Friends of Anna Song for County Board of Education for 2020 (the “Committee”) and Anna Song (“Song”) 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);

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



## **EXHIBIT 1**

### **INTRODUCTION**

Respondent Anna Song (“Song”) was an unsuccessful incumbent candidate for Santa Clara County Board of Education, Trustee of Area 5, in the November 3, 2020 General Election. Respondent, Friends of Anna Song for County Board of Education for 2020 (ID# 1241672) (the “Committee”), is Song’s controlled committee. Song serves as the Committee’s treasurer.

This matter arose from filing officer referrals from the County of Santa Clara and a sworn complaint.

The Political Reform Act (the “Act”)<sup>1</sup> requires controlled committees to timely file certain campaign statements and reports to disclose contributions received and expenditures made.

As a controlled committee, its candidate, and its treasurer, the Committee and Song violated the Act by failing to timely file eight semi-annual campaign statements, four pre-election campaign statements, and 24-hour contribution reports for 12 late contributions received.

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

When the Commission determines probable cause exists for believing that the Act has been violated, it may hold a hearing to determine if a violation has occurred.<sup>2</sup> Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure Act (the “APA”).<sup>3</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>4</sup>

Included among the rights afforded a respondent under the APA, is the right of the respondents to file a 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

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. Unless otherwise indicated, all regulatory references are to Title 2, Division 6 of the California Code of Regulations.

<sup>2</sup> Section 83116.

<sup>3</sup> The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

<sup>4</sup> Section 11503.

cannot identify the transaction or prepare a defense; (4) admit the accusation in whole or in part; (5) present new matter by way of 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>5</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>6</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>7</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 the Act starts the administrative action.<sup>8</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>9</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>10</sup>

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>11</sup>

Documents supporting the procedural history are included in the attached Certification of Records ("Certification") filed herewith at Exhibit 1, A-1 through A-16, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated an administrative action against the Committee and Song in this matter by serving them with a

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<sup>5</sup> Section 11506, subd. (a)(1)–(6).

<sup>6</sup> Section 11506, subd. (c).

<sup>7</sup> Section 11520, subd. (a).

<sup>8</sup> Section 91000.5, subd. (a).

<sup>9</sup> Section 83115.5.

<sup>10</sup> *Id.*

<sup>11</sup> Section 91000.5.

Report in Support of a Finding of Probable Cause (the “Report”) (Certification, Exhibit A-1) by certified mail.<sup>12</sup> The Committee and Song were served with the Report on April 1, 2022. (Certification, Exhibit A-2.) The administrative action commenced on April 1, 2022, 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 Song contained a cover letter and a memorandum describing probable cause proceedings, advising that the Committee and Song had 21 days to request a probable cause conference and/or to file a written response to the Report. The Committee and Song did not request a probable cause conference or submit a written response to the Report within the statutory period, which ended on April 22, 2022.

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

Because the Committee and Song 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 May 2, 2022. (Certification, Exhibit A-3.)

On or around May 10, 2022, the Hearing Officer, Legal Division, Jack Woodside, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on the Committee and Song. (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>13</sup>

Section 11503 states:

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

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<sup>12</sup> Section 83115.5.

<sup>13</sup> Regulation 18361.4, subd. (g).

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 postcard 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>14</sup> The APA also sets forth the language required in the accompanying statement to the respondent.<sup>15</sup>

The Accusation and accompanying information may be sent to the respondent by any means selected by the agency. Still, 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>16</sup>

On August 5, 2022, the Commission's Chief of Enforcement, Angela Brereton, issued an Accusation against the Committee and Song. (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 Song by personal service on August 16, 2022. (Certification, Exhibit A-6.)

Along with the Accusation, the Enforcement Division served the Committee and Song 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. (Certification, Exhibit A-7.) The Committee and Song did not file a Notice of Defense within the statutory time period, which ended on September 1, 2022.

As a result, on October 31, 2023, the Enforcement Division sent a letter to the Committee and Song advising that this matter would be submitted for a Default Decision and Order at the Commission's public meeting scheduled for January 18, 2024. (Certification, Exhibit A-15.)

On November 28, 2023, the Enforcement Division sent another letter to the Committee and Song advising that this matter would be submitted for a Default Decision and Order at the Commission's public meeting scheduled for January 18, 2024. (Certification, Exhibit A-16.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

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<sup>14</sup> Section 11505, subd. (a).

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

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

## SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred in 2018 through 2022. 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 candidates, as well as the committees controlled by them, to disclose all contributions and expenditures made throughout a campaign.<sup>17</sup> Another is to provide adequate enforcement mechanisms so the Act will be “vigorously enforced.”<sup>18</sup>

A “recipient committee” is a person or combination of persons who directly or indirectly receive contributions totaling \$2,000 or more in a calendar year.<sup>19</sup> A “controlled committee” includes a recipient committee controlled directly or indirectly by a candidate.<sup>20</sup>

The Act requires candidates, committees, and treasurers to file campaign statements at specific times disclosing information regarding contributions received and expenditures made by campaign committees.<sup>21</sup> If the filing due date falls on a Saturday, Sunday, or official state holiday, then the filing due date for such a statement or report shall be extended to the next regular business day.<sup>22</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 before an election.<sup>23</sup>

Recipient committees must file semi-annual campaign statements each year no later than July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.<sup>24</sup>

All candidates appearing on the ballot at the next election, and their controlled committees, must file pre-election campaign statements.<sup>25</sup> The first pre-election campaign statement, for the period ending 45 days before the election, must be filed no later than 40 days before the election.<sup>26</sup> The second preelection campaign statement, for the period ending 17 days before the election, must be filed no later than 12 days before the election.<sup>27</sup>

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<sup>17</sup> Section 81002, subd. (a).

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

<sup>19</sup> Section 82013, subd. (a).

<sup>20</sup> Section 82016, subd. (a).

<sup>21</sup> See Section 84200, *et seq*

<sup>22</sup> Section 81005, subd. (a).

<sup>23</sup> Section 81005, subd. (b)(1).

<sup>24</sup> Section 84200, subd. (a).

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

<sup>26</sup> Section 84200.8, subd. (a).

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

If a candidate or elected officer controls more than one committee for the purpose of election to office, including committees established for a different elective office, the candidate or elected officer must file campaign statements for each of these committees on the dates the candidate or elected officer is required to file pre-election campaign statements in connection with their election to office.<sup>28</sup>

A “late contribution” includes a contribution or loan that totals in the aggregate \$1,000 or more and is made to or received by a candidate or a controlled committee during the 90-day period preceding the date of the election or on the date of the election, at which the candidate is to be voted on.<sup>29</sup> Each committee that receives a late contribution shall report the late contribution within 24 hours of the time it is received.<sup>30</sup> Each committee that receives a late non-monetary contribution shall report the late non-monetary contribution within 48 hours of the time it is received.<sup>31</sup>

Filing obligations continue until termination of the committee.<sup>32</sup> A treasurer of a recipient committee may terminate the committee’s status as a committee only by completing the termination section on the statement of organization declaring, under penalty of perjury, that the committee: (1) has ceased to receive contributions and make expenditures; (2) has eliminated or has declared that it has no intention or ability to discharge all of its debts, loans received and other obligations; (3) has no surplus funds; and (4) has filed all required campaign statements disclosing all reportable transactions.<sup>33</sup>

## SUMMARY OF THE EVIDENCE

Song was first elected to the Santa Clara County Board of Education in the November 7, 2000 General Election and was reelected in 2004, 2008, 2012, and 2016. Song was unsuccessful in the November 3, 2020 General Election, receiving 46.6% of the votes, and left office with the Santa Clara County Board of Education on December 11, 2020. (Certification, Exhibit A-8.) Additionally, Song appeared on the March 3, 2020 Primary Election ballot as a candidate for State Assembly, District 25. (Certification, Exhibit A-8.) Anna Song for Assembly 2020 (ID# 1418764) was Song’s controlled committee. Song was unsuccessful in the March 3, 2020 Primary Election receiving 12.7% of the votes. (Certification, Exhibit A-8.)

Song redesignated the Committee for the 2020 General Election by filing an amendment to the statement of organization on August 6, 2020. (Certification, Exhibit A-9.) Between July 1, 2017 and December 31, 2021, the Committee reported approximately \$175,938 in contributions and \$157,961 in expenditures. (Certification, Exhibits A-10, A-11, A-12, A-13.) To date, the Committee remains open.

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<sup>28</sup> Regulation 18405, subd. (a).

<sup>29</sup> Section 82036, subd. (a).

<sup>30</sup> Section 84203, subd. (a).

<sup>31</sup> Section 84203.3, subd. (b).

<sup>32</sup> Section 84214.

<sup>33</sup> Regulation 18404, subd. (b)



Failure to Timely File Semi-Annual and Pre-Election Campaign Statements

The Committee was required to file semi-annual campaign statements until the Committee terminated. Since Song appeared on the March 3, 2020 Primary Election ballot as a candidate for State Assembly, the Committee was required to file pre-election campaign statements prior to the March 3, 2020 Primary Election. Since Song appeared on the November 3, 2020 General Election ballot, the Committee was required to file pre-election campaign statements prior to the election.

According to the County of Santa Clara, the Committee filed pre-election and semi-annual campaign statements as follows (Certification, Exhibits A-10, A-11, A-12.):

<b>Statement</b>	<b>Reporting Period</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Activity Reported</b>
Semi-Annual	7/1/2017 – 12/31/2017	1/31/2018	12/18/2018 (321 days late)	CTB: \$0 EXP: \$0
Semi-Annual	1/1/2018 – 6/30/2018	7/31/2018	12/18/2018 (140 days late)	CTB: \$0 EXP: \$0
Semi-Annual	7/1/2018 – 12/31/2018	1/31/2019	11/03/2020 (642 days late)	CTB: \$0 EXP: \$0
Semi-Annual	1/1/2019 – 6/30/2019	7/31/2019	11/03/2020 (461 days late)	CTB: \$0 EXP: \$0
Semi-Annual	7/1/2019 – 12/31/2019	1/31/2020	11/03/2020 (277 days late)	CTB: \$0 EXP: \$0
First Pre-Election	1/1/2020 – 1/18/2020	1/23/2020	11/03/2020 <sup>34</sup> (285 days late)	CTB: \$0 EXP: \$0
Second Pre-Election	1/19/2020 – 2/15/2020	2/20/2020	11/03/2020 (257 days late)	CTB: \$0 EXP: \$0
Semi-Annual	2/16/2020 – 6/30/2020	7/31/2020	11/03/2020 (95 days late)	CTB: \$0 EXP: \$0
First Pre-Election	7/1/2020 – 9/19/2020	9/24/2020	11/03/2020 (40 days late)	CTB: \$10,410 EXP: \$4,410 <sup>35</sup>
Second Pre-Election	9/20/2020 – 10/17/2020	10/22/2020	11/03/2020 (12 days late)	CTB: \$116,187 EXP: \$104,187
Semi-Annual	10/18/2020 – 12/31/2020	2/01/2021	01/29/2021	CTB: \$42,242 EXP: \$43,652
Semi-Annual	1/1/2021 – 6/30/2021	08/02/2021	11/15/2022 (470 days late)	CTB: \$0 EXP: \$4,392
Semi-Annual	7/1/2021 – 12/31/2021	1/31/2022	11/15/2022 (288 days late)	CTB: \$0 EXP: \$1,320

<sup>34</sup> Instead of filing pre-election campaign statements before the March 3, 2020 Primary Election, the Committee filed a semi-annual campaign statement for the reporting period of January 1, 2020 to June 30, 2020, on November 3, 2020.

<sup>35</sup> An expenditure totaling \$4,410 was not disclosed until the Committee filed an amendment to the campaign statement on November 15, 2022. The expenditure was made to the County of Santa Clara Registrar of Voters for payment of the candidate statement.

To date, the Committee has not filed a statement of organization to terminate the Committee’s status as a committee. Thus, the Committee continues to have filing obligations.<sup>36</sup>

Failure to Timely File 24-Hour Contribution Reports

Since Song appeared on the November 3, 2020 General Election ballot, the Committee was required to timely file 24-hour contribution reports within 24 hours of receiving a late monetary contribution or within 48 hours of receiving a late non-monetary contribution during the 90-day period preceding the election, which began on August 5, 2020. The Committee’s campaign statements reported late contributions and late non-monetary contributions received that were required to be disclosed on 24-hour contribution reports. (Certification, Exhibit A-11.)

According to the County of Santa Clara, the Committee filed 24-hour contribution reports as follows (Certification, Exhibit A-13.):

DATE RECEIVED	CONTRIBUTOR	AMOUNT	DUE DATE	DATE FILED
08/06/2020	Anna Song	\$4,410	08/07/2020	11/03/2020 (88 days late)
08/07/2020	Charter Public Schools PAC	\$6,000	08/10/2020	11/03/2020 (85 days late)
09/25/2020	Santa Clara Charter Advocates for Great Schools	\$10,000	09/28/2020	11/03/2020 (36 days late)
10/03/2020	Preston Smith	\$1,000	10/05/2020	11/03/2020 (29 days late)
10/03/2020	Cheye Calvo	\$1,000	10/05/2020	11/03/2020 (29 days late)
10/05/2020	Charter Public Schools PAC	\$22,440*	10/07/2020	11/03/2020 (27 days late)
10/08/2020	Charter Public Schools PAC	\$40,000*	10/12/2020	11/03/2020 (22 days late)
10/11/2020	Charter Public Schools PAC	\$4,000*	10/13/2020	11/03/2020 (21 days late)
10/12/2020	Charter Public Schools PAC	\$219.72*	N/A	11/03/2020
10/13/2020	Charter Public Schools PAC	\$22,440*	10/15/2020	11/03/2020 (19 days late)
10/15/2020	Charter Public Schools PAC	\$15,088*	10/19/2020	11/03/2020 (15 days late)

<sup>36</sup> On November 15, 2022, the Committee filed a semi-annual campaign statement for the reporting period of January 1, 2022 through June 30, 2022, due August 1, 2022. This statement disclosed the Committee’s ending cash balance as \$11,627. As of the date of this default, the Committee has not yet filed semi-annual campaign statements for the reporting periods ending December 31, 2022 and June 30, 2023, by the January 31, 2023 and July 31, 2023 respective due dates. These campaign statements were for reporting periods occurring after the PC Report was served.

10/21/2020	Charter Public Schools PAC	\$21,944*	10/23/2020	11/03/2020 (11 days late)
10/26/2020	Charter Public Schools PAC	\$21,937*	10/28/2020	11/03/2020 (6 days late)
10/29/2020	Charter Public Schools PAC	\$460*	N/A	11/03/2020
11/03/2020	Champions for Education PAC	\$5,000	11/04/2020	11/03/2020

\* Disclosed as a non-monetary contribution to the Committee on campaign statements.

In summary, the Committee failed to timely file 24-hour contribution reports for 12 late contributions received totaling \$170,259. The Committee reported these late contributions on the date of the election on 24-hour contribution reports. Additionally, certain contributors, including Charter Public Schools PAC (ID# 1302433) and Santa Clara Charter Advocates for Great Schools (ID# 1384928), disclosed the late contributions they made to the Committee before the election on timely filed 24-hour contribution reports.

### Summary of Contact

The Enforcement Division contacted the Committee and Song multiple times regarding this matter. At various points, Song engaged in the process but ultimately failed to participate.

Overall, the Enforcement Division contacted the Committee and Song at least 48 times throughout this case, as follows:

- November 4, 2019: 30-day demand letter sent via mail and email
- February 26, 2020: email sent
- June 16, 2020: email sent
- October 26, 2020: telephone call, email sent
- October 27, 2020: telephone call, email sent
- October 28, 2020: five telephone calls, three emails sent
- October 29, 2020: two telephone calls, email sent
- October 30, 2020: three telephone calls, email sent notifying Song that the Enforcement Division filed a Complaint for Injunctive Relief and Monetary Penalties (“Injunction”) with the County of Santa Clara Superior Court
- November 2, 2020: four telephone calls, two emails sent
- November 3, 2020: telephone calls (spoke with Song), emails sent (Song responded)
- December 3, 2020: Notice of Entry of Dismissal of Injunction sent via mail
- March 2, 2021: email sent
- January 6, 2022: telephone call, email sent
- January 14, 2022: telephone call, email sent
- January 31, 2022: telephone call, email sent

- April 1, 2022: Report in Support of Probable Cause served on the Committee and Song via certified mail
- May 3, 2022: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served sent to the Committee and Song via mail
- May 5, 2022: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served sent to the Committee and Song via email
- August 16, 2022: Accusation personally served on Song, individually and on behalf of the Committee
- September 1, 2022: received telephone call from Song (spoke with Song)
- September 12, 2022: email sent
- September 20, 2022: email sent
- September 30, 2022: email sent
- October 14, 2022: telephone call, email sent
- October 28, 2022: telephone call, email sent
- November 14, 2022: responded to email from Song
- November 15, 2022: received telephone call from Song (spoke with Song)
- February 22, 2023: telephone call, email sent
- May 22, 2023: email sent
- May 30, 2023: telephone call, email sent, letter sent via mail
- June 2, 2023: telephone call, email sent
- June 22, 2023: telephone call, email sent
- June 27, 2023: telephone call, email sent
- October 31, 2023: letter sent via U.S. Mail and email to the Committee and Song informing them that a Default Decision and Order would appear on the agenda for the November 16, 2023 Commission meeting as a pre-notice item
- November 28, 2023: Notice of Intent to Enter Default Decision and Order sent via first class mail to the Committee and Song informing them that the Default Decision and Order would be presented at the January 18, 2024 meeting for Commission action

## **VIOLATIONS**

The Committee and Song committed 15 violations of the Act as follows:

### COUNT 1

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

The Committee and Song had a duty to timely file semi-annual campaign statements for the reporting periods ending December 31, 2017, June 30, 2018, and December 31, 2018, by the January 31, 2018, July 31, 2018, and January 31, 2019, respective due dates. By failing to timely file the applicable semi-annual campaign statements, by the respective due dates, the Committee and Song violated Government Code Section 84200.

COUNT 2

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

The Committee and Song had a duty to timely file semi-annual campaign statements for the reporting periods ending June 30, 2019, December 31, 2019, and June 30, 2020, by the July 31, 2019, January 31, 2020, and July 31, 2020, respective due dates. By failing to timely file the applicable semi-annual campaign statements, by the respective due dates, the Committee and Song violated Government Code Section 84200.

COUNT 3

**Failure to Timely File Pre-Election Campaign Statements**

The Committee and Song had a duty to timely file pre-election campaign statements for the reporting periods ending January 18, 2020 and February 15, 2020, by the January 23, 2020 and February 20, 2020, respective due dates. By failing to timely file the applicable pre-election campaign statements, by the respective due dates, the Committee and Song violated Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

COUNT 4

**Failure to Timely File Pre-Election Campaign Statement**

The Committee and Song had a duty to timely file a pre-election campaign statement for the reporting period ending September 19, 2020, by the September 24, 2020 due date. By failing to timely file a pre-election campaign statement by the September 24, 2020 due date, the Committee and Song violated Government Code Sections 84200.5 and 84200.8.

COUNT 5

**Failure to Timely File Pre-Election Campaign Statement**

The Committee and Song had a duty to timely file a pre-election campaign statement for the reporting period ending October 17, 2020, by the October 22, 2020 due date. By failing to timely file a pre-election campaign statement by the October 22, 2020 due date, the Committee and Song violated Government Code Sections 84200.5 and 84200.8.

COUNT 6

**Failure to Timely File Semi-Annual Campaign Statement**

The Committee and Song had a duty to timely file a semi-annual campaign statement for the reporting period ending June 30, 2021, by the August 2, 2021 due date. By failing to timely

file a semi-annual campaign statement by the August 2, 2021 due date, the Committee and Song violated Government Code Section 84200.

COUNT 7

**Failure to Timely File Semi-Annual Campaign Statement**

The Committee and Song had a duty to timely file a semi-annual campaign statement for the reporting period ending December 31, 2021, by the January 31, 2022 due date. By failing to timely file a semi-annual campaign statement by the January 31, 2022 due date, the Committee and Song violated Government Code Section 84200.

COUNT 8

**Failure to Timely File 24-Hour Contribution Reports**

The Committee and Song had a duty to timely file two 24-hour contribution reports for a late contribution of \$4,410 by the August 7, 2020 due date and for a late contribution of \$6,000 by the August 10, 2020 due date. By failing to timely file two 24-hour contribution reports by the August 7, 2020 and August 10, 2020 respective due dates, the Committee and Song violated Government Code Section 84203.

COUNT 9

**Failure to Timely File 24-Hour Contribution Reports**

The Committee and Song had a duty to timely file two 24-hour contribution reports for a late contribution of \$10,000 by the September 28, 2020 due date and for two late contributions totaling \$2,000 by the October 5, 2020 due date. By failing to timely file two 24-hour contribution reports by the September 28, 2020 and October 5, 2020 respective due dates, the Committee and Song violated Government Code Section 84203.

COUNT 10

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

The Committee and Song had a duty to timely file 24-hour contribution report for a late non-monetary contribution of \$22,440 by the October 7, 2020 due date. By failing to timely file a 24-hour contribution report by the October 7, 2020 due date, the Committee and Song violated Government Code Sections 84203 and 84203.3.

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COUNT 11

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

The Committee and Song had a duty to timely file 24-hour contribution report for a late non-monetary contribution of \$40,000 by the October 12, 2020 due date. By failing to timely file a 24-hour contribution report by the October 12, 2020 due date, the Committee and Song violated Government Code Sections 84203 and 84203.3.

COUNT 12

**Failure to Timely File 24-Hour Contribution Reports**

The Committee and Song had a duty to timely file two 24-hour contribution reports for a late non-monetary contribution of \$4,000 by the October 13, 2020 due date and for a late non-monetary contribution of \$15,088 by the October 19, 2020 due date. By failing to timely file two 24-hour contribution reports by the October 13, 2020 and October 19, 2020 respective due dates, the Committee and Song violated Government Code Sections 84203 and 84203.3.

COUNT 13

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

The Committee and Song had a duty to timely file 24-hour contribution report for a late non-monetary contribution of \$22,440 by the October 15, 2020 due date. By failing to timely file a 24-hour contribution report by the October 15, 2020 due date, the Committee and Song violated Government Code Sections 84203 and 84203.3.

COUNT 14

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

The Committee and Song had a duty to timely file 24-hour contribution report for a late non-monetary contribution of \$21,944 by the October 23, 2020 due date. By failing to timely file a 24-hour contribution report by the October 23, 2020 due date, the Committee and Song violated Government Code Sections 84203 and 84203.3.

COUNT 15

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

The Committee and Song had a duty to timely file 24-hour contribution report for a late non-monetary contribution of \$21,937 by the October 28, 2020 due date. By failing to timely file a 24-hour contribution report by the October 28, 2020 due date, the Committee and Song

violated Government Code Sections 84203 and 84203.3.

## CONCLUSION

This matter consists of 15 counts of violating the Act, which carry a maximum total administrative penalty of \$75,000.<sup>37</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>38</sup>

In this matter, between January 31, 2018 and January 31, 2022, the Committee and Song failed to timely file eight semi-annual campaign statements, four pre-election campaign statements, and 11 24-hour contribution reports.

The failure to comply with campaign filing obligations resulted in a lack of complete and accurate information for the voting public regarding the Committee's and Song's campaign activity before the November 3, 2020 General Election. All of the Committee's expenditures occurred between September 20, 2020 through the date of the election and were not reported until election day. Further, the late contributions received during the 90-day period represent 100% of the Committee's total contributions received.

Song is experienced with the requirements of the Act as Song has had a controlled committee since at least 2001. Song had previously campaigned for the position with the Santa Clara County Board of Education in 2000, 2004, 2008, and 2012 and filed the required campaign statements.

In this matter, there was no evidence to support an intent to conceal, deceive or mislead the public as to the Committee's receipts and expenditures; however, the evidence establishes that certain filings were not voluntary either, as they were only made after numerous

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<sup>37</sup> Section 83116, subd. (c).

<sup>38</sup> Regulation 18361.5, subd. (e).



Enforcement Division contacts and the filing of an Injunction. There is no evidence to suggest that Song consulted with Commission staff or any other governmental agency regarding the Committee's filing obligations.

The violations presented here are not isolated but instead appear to be part of a pattern. The Committee and Song have failed to timely file campaign statements since 2017 and continued to late-file campaign statements after receiving contact from the Enforcement Division regarding this matter. Further, Song has a prior history of violating the Act. On June 21, 2011, the Enforcement Division issued a Warning Letter to Song and Song's controlled committee for Assembly for its failure to timely file a semi-annual campaign statement for the reporting period ending June 30, 2010.<sup>39</sup> On March 21, 2019, the Commission approved a default judgment against the Committee and Song for two counts of failing to timely file semi-annual campaign statements for the reporting periods ending December 31, 2016 and June 30, 2017, with a total penalty of \$8,000.<sup>40</sup> Thus, Song knew, or should have known, of the Committee's filing obligations under the Act.

While the Committee and Song eventually filed the outstanding campaign statements and reports, the statements and reports were filed after the Committee and Song received multiple requests to file from the Enforcement Division. Between November 4, 2019 and October 30, 2020, the Enforcement Division contacted Song at least 13 times in writing and 12 times via phone regarding the Committee's outstanding campaign statements. After not receiving compliance, on October 30, 2020, the Enforcement Division filed an Injunction against the Committee and Song with the County of Santa Clara Superior Court. (Certification, Exhibit A-14.) On November 2, 2020, the Enforcement Division issued a press release concerning the filing of the Injunction. On November 3, 2020, the day of the election, the Committee filed the outstanding campaign statements and reports as discussed above. Since the outstanding campaign statements and reports had been filed, the Enforcement Division requested for the Injunction to be dismissed which was approved by the Court.

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

#### Counts 1-2

- *In the Matter of D. Shelly Yarbrough and Yarbrough for Val Verde School Board 2014*; FPPC No. 16/117. (The Commission approved a default decision on February 18, 2021). The respondents, among other violations, failed to timely file seven semi-annual campaign statements. Yarbrough had prior experience with the Act and a prior enforcement history for failing to timely file semi-annual campaign statements. In aggravation, at the time of the default, these semi-annual campaign statements remained outstanding. The Commission imposed a penalty of \$3,000 per count for seven counts.

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<sup>39</sup> FPPC Case No. 11/124.

<sup>40</sup> FPPC Case No. 17/107.

Here, the Committee and Song failed to timely file six semi-annual campaign statements. Unlike *Yarbrough*, the Committee and Song filed the outstanding campaign statements after receiving contact from the Enforcement Division. The statements reported no campaign activity during the reporting periods. Similar to *Yarbrough*, Song had prior experience with the Act and a prior enforcement history for failing to timely file semi-annual campaign statements. In consideration of the factors and since the outstanding statements have been filed which reported no campaign activity, a penalty of \$5,000 per count is recommended for two counts.

### Count 3

- *In the Matter of Joe Aguirre and Friends of Joe Aguirre for Delano City Council 2014*; FPPC No. 17/193. (The Commission approved a default decision on March 24, 2022.) The respondents, among other violations, failed to timely file two pre-election campaign statements prior to the November 8, 2016 General Election. Aguirre had prior experience with the Act and eventually filed the outstanding campaign statements after receiving contact from the Enforcement Division and after the relevant election. The Enforcement Division determined that these violations would have qualified for the Commission's Streamline Program as they resulted in low public harm. The Commission imposed a penalty of \$5,000 per count for two counts.

Here, since Song appeared on the March 3, 2020 Primary Election ballot as a candidate for State Assembly, the Committee and Song were also required to file pre-election campaign statements prior to the election but failed to do so. Song's controlled Assembly committee, Anna Song for Assembly 2020, timely filed pre-election campaign statements prior to the March 3, 2020 Primary Election. Similar to *Aguirre*, the outstanding campaign statements were filed after receiving contact from the Enforcement Division and after the relevant election. Unlike *Aguirre*, the statements reported no campaign activity during the reporting periods. In consideration of the factors, a penalty of \$5,000 per count is recommended for one count.

### Counts 4-5

- *In the Matter of Alfonso Sanchez and Alfonso Sanchez for School Board 2016*; FPPC No. 16/20105. (The Commission approved a default decision on January 15, 2020.) The respondents, among other violations, failed to timely file two pre-election campaign statements prior to the November 8, 2016 General Election. The Enforcement Division filed an Injunction with the County of San Bernardino Superior Court and an order was issued to compel respondents to file the outstanding campaign statements. Later, respondents filed the outstanding campaign statements. Sanchez had prior experience with the Act but no prior enforcement history. The Commission imposed a penalty of \$5,000 per count for two counts.

Here, the Committee and Song failed to timely file two pre-election campaign statements

prior to the November 3, 2020 General Election. After receiving notification from the Enforcement Division that an Injunction had been filed against the Respondents in this matter, the Committee and Song filed the outstanding pre-election campaign statements on the day of the election. In consideration of the factors, a penalty of \$5,000 per count is recommended for two counts.

#### Counts 6-7

- *In the Matter of Thomas Benson for Signal Hill City Council 2017 and Thomas Benson*; FPPC No. 2018/00171. (The Commission approved a default decision on September 16, 2021.) The respondents failed to timely file three semi-annual campaign statements. These statements disclosed or would have disclosed no campaign activity during the relevant reporting periods. Benson had prior experience with the Act and a prior enforcement history for failing to timely file a semi-annual campaign statement. The Commission imposed a penalty of \$3,000 per count for three counts.

Here, the Committee and Song failed to timely file two semi-annual campaign statements to disclose \$5,712 in expenditures. After receiving contact from the Enforcement Division, the outstanding campaign statements were filed. In consideration of the factors, a penalty of \$3,500 per count is recommended for two counts.

#### Counts 8-15

- *In the Matter of Californians in Support of Mike Antonovich State Senate 2016 and Shelley Levine*; FPPC Nos. 2017/01397 and 2018/00821. (The Commission approved a default decision on March 24, 2022.) The respondents, among other violations, failed to timely file two 24-hour contribution reports for late contributions received of \$10,000 and \$3,000. The reports were filed after the relevant election and the late contributions at issue were not disclosed prior to the election. The respondents did not have prior experience with the Act; however, the respondents were aware of the 24-hour filing obligation as they had previously, and timely, filed a 24-hour contribution report. The Commission imposed a penalty of \$4,500 for one count.

Here, as to Counts 8-15, unlike *Antonovich*, the Committee and Song were experienced with the Act. Also, unlike *Antonovich*, the Committee and Song filed the reports on the day of the election after receiving notification from the Enforcement Division that an Injunction had been filed.

As to Count 8, the Committee and Song failed to timely file two 24-hour contribution reports for two late contributions received of \$4,410 and \$6,000. In mitigation, the source of the \$6,000 contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$3,500 is recommended for one count.

As to Count 9, the Committee and Song failed to timely file two 24-hour contribution reports for two late contributions received of \$10,000 and \$2,000. In mitigation, the source of the \$10,000 contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$3,500 is recommended for one count.

As to Count 10, the Committee and Song failed to timely file a 24-hour contribution report for a late non-monetary contribution received totaling \$22,440. In mitigation, the source of this late non-monetary contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$4,000 is recommended for one count.

As to Count 11, the Committee and Song failed to timely file a 24-hour contribution report for a late non-monetary contribution received totaling \$40,000. In mitigation, the source of this late non-monetary contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$4,500 is recommended for one count.

As to Count 12, the Committee and Song failed to timely file two 24-hour contribution reports for two late non-monetary contributions received of \$4,000 and \$15,088. In mitigation, the source of these late non-monetary contributions disclosed the late contributions made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$4,000 is recommended for one count.

As to Count 13, the Committee and Song failed to timely file a 24-hour contribution report for a late non-monetary contribution received totaling \$22,440. In mitigation, the source of this late non-monetary contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$4,000 is recommended for one count.

As to Count 14, the Committee and Song failed to timely file a 24-hour contribution report for a late non-monetary contribution received totaling \$21,944. In mitigation, the source of this late non-monetary contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$4,000 is recommended for one count.

As to Count 15, the Committee and Song failed to timely file a 24-hour contribution report for a late non-monetary contribution received totaling \$21,937. In mitigation, the source of this late non-monetary contribution disclosed the late contribution made on a timely filed pre-election campaign statement and 24-hour contribution report. In consideration of the factors, a penalty of \$4,000 is recommended for one count.

## PROPOSED PENALTY

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

<b>Count</b>	<b>Violation</b>	<b>Proposed Penalty</b>
1	Failure to Timely File Semi-Annual Campaign Statements	\$5,000
2	Failure to Timely File Semi-Annual Campaign Statements	\$5,000
3	Failure to Timely File Pre-Election Campaign Statements	\$5,000
4	Failure to Timely File Pre-Election Campaign Statement	\$5,000
5	Failure to Timely File Pre-Election Campaign Statement	\$5,000
6	Failure to Timely File Semi-Annual Campaign Statement	\$3,500
7	Failure to Timely File Semi-Annual Campaign Statement	\$3,500
8	Failure to Timely File 24-Hour Contribution Reports	\$3,500
9	Failure to Timely File 24-Hour Contribution Reports	\$3,500
10	Failure to Timely File 24-Hour Contribution Report	\$4,000
11	Failure to Timely File 24-Hour Contribution Report	\$4,500
12	Failure to Timely File 24-Hour Contribution Reports	\$4,000
13	Failure to Timely File 24-Hour Contribution Report	\$4,000
14	Failure to Timely File 24-Hour Contribution Report	\$4,000
15	Failure to Timely File 24-Hour Contribution Report	\$4,000
	<b>Total:</b>	<b>\$63,500</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 Commission's records 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. 20/950; Friends of Anna Song for County Board of Education for 2020 and Anna Song* 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 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 March 28, 2022
- EXHIBIT A-2: Proof of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated March 29, 2022, and accompanying certified mail receipts and USPS tracking
- EXHIBIT A-3: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated May 2, 2022
- EXHIBIT A-4: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated May 10, 2022
- EXHIBIT A-5: Accusation, dated August 5, 2022
- EXHIBIT A-6: Proof of Service on August 16, 2022, for Accusation and accompanying documents from process server, dated August 18, 2022

- EXHIBIT A-7: Statement to Respondents, Notices of Defense, applicable statutes, and Proof of Service for Accusation and accompanying documents, dated August 8, 2022
- EXHIBIT A-8: 2020 Election Results for Anna Song
- EXHIBIT A-9: Statement of organization, filed on August 6, 2020
- EXHIBIT A-10: Semi-annual campaign statements for the reporting period of:  
July 1, 2017 to December 31, 2017, filed December 18, 2018;  
January 1, 2018 to June 30, 2018, filed December 18, 2018;  
July 1, 2018 to December 31, 2018, filed November 3, 2020;  
January 1, 2019 to June 30, 2019, filed November 3, 2020;  
July 1, 2019 to December 31, 2019, filed November 3, 2020;  
January 1, 2020 to June 30, 2020, filed November 3, 2020
- EXHIBIT A-11: Pre-election and semi-annual campaign statements for the reporting period of:  
July 1, 2020 to September 19, 2020, filed November 3, 2020;  
September 20, 2020 to October 17, 2020, filed November 3, 2020;  
October 18, 2020 to December 31, 2020, filed January 29, 2021
- EXHIBIT A-12: Semi-annual campaign statements for the reporting periods of:  
January 1, 2021 to June 30, 2021, filed November 15, 2022;  
July 1, 2021 to December 31, 2021, filed November 15, 2022;  
January 1, 2022 to June 30, 2022, filed November 15, 2022
- EXHIBIT A-13: 24-hour contribution reports filed November 3, 2020
- EXHIBIT A-14: Complaint for Injunctive Relief and Monetary Penalties, e-filed October 30, 2020
- EXHIBIT A-15: Notice of Default Decision and Order, dated October 31, 2023
- EXHIBIT A-16: Notice of Intent to Enter Default Decision and Order, dated November 28, 2023

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 20, 2023, at Sacramento, California.



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

**Exhibit A-1**



1 ANGELA J. BRERETON  
Chief of Enforcement  
2 JENNA C. RINEHART  
Commission Counsel  
3 **FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q Street, Suite 3000  
4 Sacramento, CA 95811  
Telephone: (916) 323-6302  
5 Email: JRinehart@fppc.ca.gov

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

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

11 In the Matter of

FPPC Case No. 20/950

12  
13 ANNA SONG and FRIENDS OF  
14 ANNA SONG FOR COUNTY BOARD  
OF EDUCATION FOR 2020,  
15  
16 Respondents.

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

Hearing Date: TBA  
Hearing Time: TBA  
Hearing Location: Commission Offices  
1102 Q Street, Suite 3000  
Sacramento, CA 95811

17 **INTRODUCTION**

18 Respondent, Anna Song (“Song”), was an unsuccessful incumbent candidate for Santa Clara  
19 County Board of Education, Trustee of Area 5, in the November 3, 2020 General Election. Respondent,  
20 Friends of Anna Song for County Board of Education for 2020 (ID# 1241672) (the “Committee”), is  
21 Song’s controlled committee. Song serves as the Committee’s treasurer.

22 The Political Reform Act (the “Act”)<sup>1</sup> requires controlled committees to timely file certain  
23 campaign statements and reports to disclose contributions received and expenditures made. Song and  
24 the Committee violated the Act by failing to timely file eight semi-annual campaign statements, four  
25 pre-election campaign statements, and 11 24-Hour Contribution Reports.

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28 <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 Practice Commission are contained in §§ 18110 through 18997 of 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>2</sup> This includes enforcement through  
9 administrative prosecution.<sup>3</sup> However, before the Commission’s Enforcement Division may commence  
10 administrative prosecution by filing/serving an Accusation, a hearing officer (either the General Counsel  
11 of the Commission or another attorney in the Commission’s Legal Division) must determine whether  
12 there is probable cause that supports a reasonable belief or strong suspicion that one or more violations  
13 of the Act occurred.<sup>4</sup> Any finding of probable cause is required by law to be announced publicly, which  
14 includes the posting of a summary of the allegations on the Commission’s website.<sup>5</sup> After a finding of  
15 probable cause, the Commission may then hold a hearing to determine what violations have occurred—  
16 and levy an administrative penalty of up to \$5,000 for each violation.<sup>6</sup>

17 **Standard for Finding Probable Cause**

18 For the hearing officer to make a finding of probable cause, it is only necessary that they be  
19 presented with evidence that sufficiently supports a reasonable belief or strong suspicion that the Act has  
20 been violated.<sup>7</sup> Probable cause may only be found if the Respondents were notified of the violations at  
21 least 21 days prior to the hearing officer’s consideration of the alleged violations.<sup>8</sup>

22 **Contents of the Probable Cause Report**

23 The probable cause report is required to contain a summary of the law and evidence that supports  
24 a finding of probable cause that each alleged violation of the Act has occurred, as well as a description

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26 <sup>2</sup> Section 83111.

27 <sup>3</sup> Section 83116.

28 <sup>4</sup> Sections 83115.5 and 83116; Regulations 18361, subd. (b), and 18361.4.

<sup>5</sup> Regulation 18361.4, subd. (g).

<sup>6</sup> Section 83116; Regulation 18361.4, subd. (g).

<sup>7</sup> Regulation 18361.4, subd. (a).

<sup>8</sup> Section 83115.5.

1 of any exculpatory evidence indicating a violation alleged in the report did not occur. The evidence  
2 recited in the probable cause report may include hearsay.<sup>9</sup>

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

4 When enacting the Act, the people of California found and declared that previous laws regulating  
5 political practices suffered from inadequate enforcement by state and local authorities.<sup>10</sup> For this reason,  
6 the Act is to be construed liberally to accomplish its purposes.<sup>11</sup>

7 A central purpose of the Act is to promote transparency by ensuring that receipts and  
8 expenditures in election campaigns are fully and truthfully disclosed so that voters are fully informed  
9 and improper practices are inhibited.<sup>12</sup> Another is to provide adequate enforcement mechanisms so that  
10 the Act will be “vigorously enforced.”<sup>13</sup>

11 **Controlled Committee**

12 A “recipient committee” is a person or combination of persons who directly or indirectly receive  
13 contributions totaling \$2,000 or more in a calendar year.<sup>14</sup> A “controlled committee” includes a recipient  
14 committee that is controlled directly or indirectly by a candidate.<sup>15</sup>

15 **Duty to File Campaign Statements**

16 The Act requires candidates, committees, and treasurers to file campaign statements at specific  
17 times disclosing information regarding contributions received and expenditures made by the campaign  
18 committees.<sup>16</sup>

19 If the filing due date falls on a Saturday, Sunday, or official state holiday, then the filing due date  
20 for such a statement or report shall be extended to the next regular business day.<sup>17</sup> This extension does  
21 not apply to 24-Hour Contribution Reports when the due date for these types of reports falls on a  
22 Saturday, Sunday, or official state holiday immediately before an election.<sup>18</sup>

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24 <sup>9</sup> Regulation 18361.4, subd. (b).

25 <sup>10</sup> Section 81001, subd. (h).

26 <sup>11</sup> Section 81003.

27 <sup>12</sup> Section 81002, subd. (a).

28 <sup>13</sup> Section 81002, subd. (f).

<sup>14</sup> Section 82013, subd. (a).

<sup>15</sup> Section 82016, subd. (a).

<sup>16</sup> See Section 84200, *et seq.*

<sup>17</sup> Section 81005, subd. (a).

<sup>18</sup> Section 81005, subd. (b)(1).

1 **Semi-Annual Campaign Statements**

2 Recipient committees shall file semi-annual campaign statements each year no later than July 31  
3 for the period ending June 30, and no later than January 31 for the period ending December 31.<sup>19</sup>

4 **Pre-Election Campaign Statements**

5 All candidates appearing on the ballot at the next election, and their controlled committees, shall  
6 file pre-election campaign statements.<sup>20</sup> The first pre-election campaign statement, for the period ending  
7 45 days before the election, shall be filed no later than 40 days before the election.<sup>21</sup> The second pre-  
8 election campaign statement, for the period ending 17 days before the election, shall be filed no later  
9 than 12 days before the election.<sup>22</sup>

10 If a candidate or elected officer controls more than one committee for the purpose of election to  
11 office, including committees established for a different elective office, the candidate or elected officer  
12 shall file campaign statements for each of these committees on the dates the candidate or elected officer  
13 is required to file pre-election campaign statements in connection with their election to office.<sup>23</sup>

14 **24-Hour Contribution Reports**

15 A “late contribution” includes a contribution, including a loan, that totals in the aggregate \$1,000  
16 or more and is made to or received by a candidate or a controlled committee during the 90-day period  
17 preceding the date of the election, or on the date of the election, at which the candidate is to be voted  
18 on.<sup>24</sup> Each committee that receives a late contribution shall report the late contribution within 24 hours  
19 of the time it is received.<sup>25</sup> Each committee that receives a late non-monetary contribution shall report  
20 the late non-monetary contribution within 48 hours of the time it is received.<sup>26</sup>

21 **Terminating a Committee**

22 A treasurer of a recipient committee may terminate the committee’s status as a committee, only  
23 by completing the termination section on the statement of organization declaring, under penalty of  
24

25 <sup>19</sup> Section 84200, subd. (a).  
26 <sup>20</sup> Section 84200.5, subd. (a).  
27 <sup>21</sup> Section 84200.8, subd. (a).  
28 <sup>22</sup> Section 84200.8, subd. (b).  
<sup>23</sup> Regulation 18405, subd. (a).  
<sup>24</sup> Section 82036, subd. (a).  
<sup>25</sup> Section 84203, subd. (a).  
<sup>26</sup> Section 84203.3, subd. (b).

1 perjury, that the committee: (1) has ceased to receive contributions and make expenditures; (2) has  
2 eliminated or has declared that it has no intention or ability to discharge all of its debts, loans received  
3 and other obligations; (3) has no surplus funds; and (4) has filed all required campaign statements  
4 disclosing all reportable transactions.<sup>27</sup>

5 **Candidate and Treasurer Liability**

6 Any person who has a filing or reporting obligation and who violated the Act shall be liable.<sup>28</sup>  
7 Under the Act, it is a duty of the candidate and the treasurer of a controlled committee to ensure that the  
8 committee complies with all of the requirements of the Act concerning the receipt, expenditure, and  
9 reporting of funds.<sup>29</sup> The candidate and treasurer may be held jointly and severally liable, along with the  
10 committee, for violations committed by the committee.<sup>30</sup>

11 **Liability for Violations**

12 When the Commission determines a violation has occurred, the Commission may issue an order  
13 that the respondent pay up to \$5,000 per violation.<sup>31</sup>

14 **SUMMARY OF THE EVIDENCE**

15 Song was first elected to the Santa Clara County Board of Education in the November 7, 2000  
16 General Election and was reelected in 2004, 2008, 2012, and 2016. Song was unsuccessful in the  
17 November 3, 2020 General Election, receiving 46.6% of the votes, and left office with the Santa Clara  
18 County Board of Education on December 11, 2020. Additionally, Song appeared on the March 3, 2020  
19 Primary Election ballot as a candidate for State Assembly, District 25. Anna Song for Assembly 2020  
20 (ID# 1418764) was Song’s controlled committee. Song was unsuccessful in the March 3, 2020 Primary  
21 Election receiving 12.7% of the votes.

22 According to records obtained from the Secretary of State, the Committee qualified as committee  
23 on October 30, 2000. The Committee was redesignated for Song’s 2020 Board of Education campaign  
24 on August 6, 2020. To date, the Committee remains open. According to records obtained from the

25 ///

26 \_\_\_\_\_  
27 <sup>27</sup> Regulation 18404, subd. (b).  
28 <sup>28</sup> Section 83116.5.  
<sup>29</sup> Sections 81004, 84100, 84104, and 84213; Regulation 18427.  
<sup>30</sup> Sections 83116.5 and 91006.  
<sup>31</sup> Section 83116.

1 County of Santa Clara, between July 1, 2017 and December 31, 2020, the Committee reported  
 2 approximately \$168,840 in contributions and \$147,840 in expenditures.

3 **Failure to Timely File Semi-Annual and Pre-Election Campaign Statements**

4 The Committee was required to file semi-annual campaign statements until the Committee was  
 5 terminated. Song appeared on the March 3, 2020 Primary Election ballot and on the November 3, 2020  
 6 General Election ballot; thus, the Committee was required to file pre-election campaign statements prior  
 7 to each election. Even though Song was a candidate for State Assembly, the Committee was required to  
 8 file pre-election campaign statements prior to the March 3, 2020 Primary Election because Song  
 9 appeared on the ballot. According to the County of Santa Clara, the Committee filed or failed to file pre-  
 10 election and semi-annual campaign statements as follows:

STATEMENT	REPORTING PERIOD	DUE DATE	DATE FILED	ACTIVITY REPORTED
Semi-Annual	07/01/2017 – 12/31/2017	01/31/2018	12/18/2018 (321 days late)	CTB: \$0 EXP: \$0
Semi-Annual	01/01/2018 – 06/30/2018	07/31/2018	12/18/2018 (140 days late)	CTB: \$0 EXP: \$0
Semi-Annual	07/01/2018 – 12/31/2018	01/31/2019	11/03/2020 (642 days late)	CTB: \$0 EXP: \$0
Semi-Annual	01/01/2019 – 06/30/2019	07/31/2019	11/03/2020 (461 days late)	CTB: \$0 EXP: \$0
Semi-Annual	07/01/2019 – 12/31/2019	01/31/2020	11/03/2020 (277 days late)	CTB: \$0 EXP: \$0
First Pre-Election	01/01/2020 – 01/18/2020	01/23/2020	11/03/2020 <sup>32</sup> (285 days late)	CTB: \$0 EXP: \$0
Second Pre-Election	01/19/2020 – 02/15/2020	02/20/2020	11/03/2020 (257 days late)	
Semi-Annual	02/16/2020 – 06/30/2020	07/31/2020	11/03/2020 (95 days late)	
First Pre-Election	07/01/2020 – 09/19/2020	09/24/2020	11/03/2020 (40 days late)	CTB: \$10,410 EXP: \$0
Second Pre-Election	09/20/2020 – 10/17/2020	10/22/2020	11/03/2020 (12 days late)	CTB: \$116,187 EXP: \$104,187
Semi-Annual	10/18/2020 – 12/31/2020	02/01/2021	01/29/2021	CTB: \$42,242 EXP: \$43,652
Semi-Annual	01/01/2021 – 06/30/2021	08/02/2021	Not Filed	Not Reported
Semi-Annual	07/01/2021 – 12/31/2021	01/31/2022	Not Filed	Not Reported

32 Instead of filing pre-election campaign statements prior to the March 3, 2020 Primary Election, the Committee filed a semi-annual campaign statement for the reporting period of January 1, 2020 to June 30, 2020, on November 3, 2020.

1 The semi-annual campaign statement filed January 29, 2021, for the reporting period of October  
2 18, 2020 to December 31, 2020, reported the Committee’s ending cash balance as \$26,142.99. As of the  
3 date of this report, the Committee had not filed a statement of organization to terminate the Committee’s  
4 status as a committee. Thus, the Committee is required to continue filing semi-annual campaign  
5 statements until the Committee is terminated.

6 On October 30, 2020, the Enforcement Division filed a Complaint for Injunctive Relief and  
7 Monetary Penalties (“Injunction”) with the County of Santa Clara Superior Court. On or around  
8 November 20, 2020, the Enforcement Division requested for the Injunction to be dismissed because the  
9 Committee filed its outstanding campaign statements. Further, the Enforcement Division contacted Song  
10 at least 17 times in writing and 19 times via phone between November 4, 2019 and January 31, 2022  
11 regarding the Committee’s outstanding campaign statements. As of the date of this report, the  
12 Committee had not yet filed the campaign statements for the reporting periods ending June 30, 2021 and  
13 December 31, 2021.

14 **Failure to Timely File 24-Hour Contribution Reports**

15 Song appeared on the November 3, 2020 General Election ballot; thus, the Committee was  
16 required to timely file 24-Hour Contribution Reports within 24 hours of receiving a late monetary  
17 contribution or within 48 hours of receiving a late non-monetary contribution. The 90-day period  
18 preceding the November 3, 2020 General Election began on August 5, 2020. The Committee’s  
19 campaign statements reported late contributions and late non-monetary contributions received that were  
20 required to be disclosed on 24-Hour Contribution Reports. According to the County of Santa Clara, the  
21 Committee filed 24-Hour Contribution Reports as follows:

22

DATE RECEIVED	CONTRIBUTOR	AMOUNT	DUE DATE	DATE FILED
08/06/2020	Anna Song	\$4,410	08/07/2020	11/03/2020 (88 days late)
08/07/2020	Charter Public Schools PAC	\$6,000	08/10/2020	11/03/2020 (85 days late)
09/25/2020	Santa Clara Charter Advocates for Great Schools	\$10,000	09/28/2020	11/03/2020 (36 days late)
10/03/2020	Preston Smith	\$1,000	10/05/2020	11/03/2020 (29 days late)
	Cheye Calvo	\$1,000		

23  
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10/05/2020	Charter Public Schools PAC	\$22,440*	10/07/2020	11/03/2020 (27 days late)
10/08/2020	Charter Public Schools PAC	\$40,000*	10/12/2020	11/03/2020 (22 days late)
10/11/2020	Charter Public Schools PAC	\$4,000*	10/13/2020	11/03/2020 (21 days late)
10/12/2020	Charter Public Schools PAC	\$219.72*	N/A	11/03/2020
10/13/2020	Charter Public Schools PAC	\$22,440*	10/15/2020	11/03/2020 (19 days late)
10/15/2020	Charter Public Schools PAC	\$15,088*	10/19/2020	11/03/2020 (15 days late)
10/21/2020	Charter Public Schools PAC	\$21,944*	10/23/2020	11/03/2020 (11 days late)
10/26/2020	Charter Public Schools PAC	\$21,937*	10/28/2020	11/03/2020 (6 days late)
10/29/2020	Charter Public Schools PAC	\$460*	N/A	11/03/2020
11/03/2020	Champions for Education PAC	\$5,000	11/04/2020	11/03/2020

\*Disclosed as a non-monetary contribution to the Committee on campaign statements.

In summary, the Committee failed to timely file 24-Hour Contribution Reports for 12 late contributions received totaling \$170,259. The Committee reported these late contributions on the date of the election on 24-Hour Contribution Reports. The Charter Public Schools PAC (ID# 1302433) disclosed the late contributions it made to the Committee prior to the election on timely filed 24-Hour Contribution Reports.

### VIOLATIONS

#### Count 1: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date, in violation of Government Code Section 84200.

#### Count 2: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Song failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2018 to June 30, 2018, by the July 31, 2018 due date, in violation of Government Code Section 84200.

///



1 Count 3: Failure to Timely File Semi-Annual Campaign Statement

2 The Committee and Song failed to timely file a semi-annual campaign statement for the  
3 reporting period of July 1, 2018 to December 31, 2018, by the January 31, 2019 due date, in violation of  
4 Government Code Section 84200.

5 Count 4: Failure to Timely File Semi-Annual Campaign Statement

6 The Committee and Song failed to timely file a semi-annual campaign statement for the  
7 reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation of  
8 Government Code Section 84200.

9 Count 5: Failure to Timely File Semi-Annual Campaign Statement

10 The Committee and Song failed to timely file a semi-annual campaign statement for the  
11 reporting period of July 1, 2019 to December 31, 2019, by the January 31, 2020 due date, in violation of  
12 Government Code Section 84200.

13 Count 6: Failure to Timely File Pre-Election Campaign Statement

14 The Committee and Song failed to timely file a pre-election campaign statement for the reporting  
15 period of January 1, 2020 to January 18, 2020, by the January 23, 2020 due date, in violation of  
16 Government Code Sections 84200.5 and 84200.8 and Regulation 18405.

17 Count 7: Failure to Timely File Pre-Election Campaign Statement

18 The Committee and Song failed to timely file a pre-election campaign statement for the reporting  
19 period of January 19, 2020 to February 15, 2020, by the February 20, 2020 due date, in violation of  
20 Government Code Sections 84200.5 and 84200.8 and Regulation 18405.

21 Count 8: Failure to Timely File Semi-Annual Campaign Statement

22 The Committee and Song failed to timely file a semi-annual campaign statement for the  
23 reporting period of February 16, 2020 to June 30, 2020, by the July 31, 2020 due date, in violation of  
24 Government Code Section 84200.

25 Count 9: Failure to Timely File Pre-Election Campaign Statement

26 The Committee and Song failed to timely file a pre-election campaign statement for the reporting  
27 period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date, in violation of  
28 Government Code Sections 84200.5 and 84200.8.

1 Count 10: Failure to Timely File Pre-Election Campaign Statement

2 The Committee and Song failed to timely file a pre-election campaign statement for the reporting  
3 period of September 20, 2020 to October 17, 2020, by the October 22, 2020 due date, in violation of  
4 Government Code Sections 84200.5 and 84200.8.

5 Count 11: Failure to Timely File Semi-Annual Campaign Statement

6 The Committee and Song failed to timely file a semi-annual campaign statement for the  
7 reporting period of January 1, 2021 to June 30, 2021, by the August 2, 2021 due date, in violation of  
8 Government Code Section 84200.

9 Count 12: Failure to Timely File Semi-Annual Campaign Statement

10 The Committee and Song failed to timely file a semi-annual campaign statement for the  
11 reporting period of July 1, 2021 to December 31, 2021, by the January 31, 2022 due date, in violation of  
12 Government Code Section 84200.

13 Count 13: Failure to Timely File 24-Hour Contribution Report

14 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
15 monetary contribution, totaling \$4,410, received on August 6, 2020, by the August 7, 2020 due date, in  
16 violation of Government Code Section 84203.

17 Count 14: Failure to Timely File 24-Hour Contribution Report

18 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
19 monetary contribution, totaling \$6,000, received on August 7, 2020, by the August 10, 2020 due date, in  
20 violation of Government Code Section 84203.

21 Count 15: Failure to Timely File 24-Hour Contribution Report

22 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
23 monetary contribution, totaling \$10,000, received on September 25, 2020, by the September 28, 2020  
24 due date, in violation of Government Code Section 84203.

25 Count 16: Failure to Timely File 24-Hour Contribution Report

26 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose two late  
27 monetary contributions, totaling \$2,000, received on October 3, 2020, by the October 5, 2020 due date,  
28 in violation of Government Code Section 84203.

1 Count 17: Failure to Timely File 24-Hour Contribution Report

2 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
3 non-monetary contribution, totaling \$22,440, received on October 5, 2020, by the October 7, 2020 due  
4 date, in violation of Government Code Sections 84203 and 84203.3.

5 Count 18: Failure to Timely File 24-Hour Contribution Report

6 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
7 non-monetary contribution, totaling \$40,000, received on October 8, 2020, by the October 12, 2020 due  
8 date, in violation of Government Code Sections 84203 and 84203.3.

9 Count 19: Failure to Timely File 24-Hour Contribution Report

10 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
11 non-monetary contribution, totaling \$4,000, received on October 11, 2020, by the October 13, 2020 due  
12 date, in violation of Government Code Sections 84203 and 84203.3.

13 Count 20: Failure to Timely File 24-Hour Contribution Report

14 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
15 non-monetary contribution, totaling \$22,440, received on October 13, 2020, by the October 15, 2020  
16 due date, in violation of Government Code Sections 84203 and 84203.3.

17 Count 21: Failure to Timely File 24-Hour Contribution Report

18 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
19 non-monetary contribution, totaling \$15,088, received on October 15, 2020, by the October 19, 2020  
20 due date, in violation of Government Code Sections 84203 and 84203.3.

21 Count 22: Failure to Timely File 24-Hour Contribution Report

22 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
23 non-monetary contribution, totaling \$21,944, received on October 21, 2020, by the October 23, 2020  
24 due date, in violation of Government Code Sections 84203 and 84203.3.

25 Count 23: Failure to Timely File 24-Hour Contribution Report

26 The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
27 non-monetary contribution, totaling \$21,937, received on October 26, 2020, by the October 28, 2020  
28 due date, in violation of Government Code Sections 84203 and 84203.3.

1 **EXCULPATORY INFORMATION**

2 As of December 11, 2020, Song no longer holds office with the Santa Clara County Board of  
3 Education.

4 **OTHER RELEVANT EVIDENCE**

5 Song has prior experience with the Act. Song was first elected to the Santa Clara County Board  
6 of Education in the November 7, 2000 General Election and was reelected in 2004, 2008, 2012, and  
7 2016. Also, the Committee and Song have a prior history of violating the Act. In January 2017, the  
8 Commission approved a streamline penalty of \$200 for the Committee’s failure to timely pay annual  
9 fees to the Secretary of State, in violation of Government Code Section 84101.5.<sup>33</sup> In March 2019, the  
10 Commission approved a default judgment of \$8,000 for the Committee’s failure to timely file two semi-  
11 annual campaign statements for the reporting periods ending December 31, 2016 and June 30, 2017, in  
12 violation of Government Code Section 84200.<sup>34</sup> Thus, Song knew, or should have known, of the  
13 Committee’s filing obligations under the Act.

14 **CONCLUSION**

15 Probable cause exists to believe Respondents, Anna Song and Friends of Anna Song for County  
16 Board of Education for 2020, violated the Act as detailed above. The Enforcement Division respectfully  
17 requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.

18  
19 Dated: March 28, 2022

20 Respectfully Submitted,

21 **FAIR POLITICAL PRACTICES COMMISSION**

22 Angela J. Brereton  
23 Enforcement Chief

24 *Jenna Rinehart*

25 \_\_\_\_\_  
26 By: Jenna C. Rinehart  
27 Commission Counsel  
28 Enforcement Division

28 <sup>33</sup> FPPC Case No. 15/1037.  
<sup>34</sup> FPPC Case No. 17/107.

**Exhibit A-2**

**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, California 95811. On March 29, 2022, I served the following document(s):

1. Letter dated March 29, 2022 from Jenna C. Rinehart;
2. FPPC Case No. 20/950 Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet;
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission;
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings; and
6. Probable Cause Checklist.

By United States Postal Service. I enclosed the documents in a sealed envelope or package addressed to the person at the address listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

**SERVICE LIST**

**Anna Song**



I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on March 29, 2022.

  
\_\_\_\_\_  
Amber Rodriguez

7020 0640 0002 2861 6606

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City, State, ZIP+4®	[REDACTED]

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Anna Song



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2. Article Number (Transfer from service label)

7020 0640 0002 2861 6606

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

- 
- Agent
- 
- 
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

 D. Is delivery address different from item 1?  Yes  
 if YES, enter delivery address below:  No

3. Service Type

- |  |   |
|--|---|
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| <input type="checkbox"/> Adult Signature Restricted Delivery     | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®              | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery      | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery                     | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery |   |

 Mail  
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 30)



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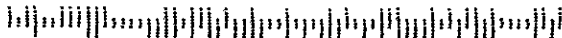
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Fair Political Practices Commission  
Attn: Jenna Rinehart  
1102 Q St, Suite 3000  
Sacramento, CA 95811

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2022 APR -4 PM 3:



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**FAQs**

**Exhibit A-3**

1 ANGELA J. BRERETON  
Chief of Enforcement  
2 JENNA C. RINEHART  
Commission Counsel  
3 **FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q Street, Suite 3000  
4 Sacramento, CA 95811  
Telephone: (916) 323-6302  
5 Email: JRinehart@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. 20/950  
11 )  
12 ANNA SONG and FRIENDS OF ANNA ) EX PARTE REQUEST FOR A FINDING OF  
13 SONG FOR COUNTY BOARD OF ) PROBABLE CAUSE AND AN ORDER THAT  
EDUCATION FOR 2020, ) AN ACCUSATION BE PREPARED AND  
14 Respondents. ) SERVED  
15 ) Gov. Code § 83115.5  
16 )

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

18 Pursuant to Section 83115.5 of the Political Reform Act (the “Act”)<sup>1</sup> and Regulation 18361.4,  
19 Respondents, Anna Song (“Song”) and Friends of Anna Song for County Board of Education for 2020  
20 (ID# 1241672) (the “Committee”), were served with copies of a Report in Support of a Finding of Probable  
21 Cause (“PC Report”) in the above-entitled matter.<sup>2</sup> The PC Report, attached as “Exhibit A,” was part of a  
22 packet of materials, including a cover letter, a memorandum describing probable cause proceedings, and  
23 a probable cause checklist form, which were sent to Song, individually and on behalf of the Committee,  
24 on March 29, 2022, by certified mail, with return receipt requested, and was delivered on April 1, 2022.  
25 A copy of the Proof of Service, return receipt, and USPS tracking results are attached as “Exhibit B.”

26 <sup>1</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 Practices Commission are contained in §§ 18110 through 18997 of Title 2 of  
the California Code of Regulations, and all regulatory references are to this source.

28 <sup>2</sup> Gov. Code § 83115.5; Cal. Code Reg., Tit. 2, § 18361.4.

1 In the cover letter dated March 29, 2022, and the attached materials, Respondents were advised  
2 they could respond in writing to the PC Report and orally present the case to the Hearing Officer at a  
3 probable cause conference to be held in Sacramento. Respondents were further advised that in order to  
4 have a probable cause conference, they needed to make a written request for one on or before 21 days of  
5 the date they were served with the PC Report. Additionally, Respondents were advised if they did not  
6 request a probable cause conference, such a conference would not be held and probable cause would be  
7 determined based solely on the PC Report and any written response submitted within 21 days of the date  
8 they were served with the PC Report. To date, Respondents have not submitted a written response or  
9 requested a probable cause conference.

10 WHEREFORE, based on the attached PC Report, the Enforcement Division requests a finding by  
11 the Hearing Officer that probable cause exists to believe that Song and the Committee committed 23  
12 violations of the Act, stated as follows:

13 Count 1: The Committee and Song failed to timely file a semi-annual campaign statement for the  
14 reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date, in  
violation of Government Code Section 84200.

15 Count 2: The Committee and Song failed to timely file a semi-annual campaign statement for the  
16 reporting period of January 1, 2018 to June 30, 2018, by the July 31, 2018 due date, in violation  
of Government Code Section 84200.

17 Count 3: The Committee and Song failed to timely file a semi-annual campaign statement for the  
18 reporting period of July 1, 2018 to December 31, 2018, by the January 31, 2019 due date, in  
violation of Government Code Section 84200.

19 Count 4: The Committee and Song failed to timely file a semi-annual campaign statement for the  
20 reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation  
of Government Code Section 84200.

21 Count 5: The Committee and Song failed to timely file a semi-annual campaign statement for the  
22 reporting period of July 1, 2019 to December 31, 2019, by the January 31, 2020 due date, in  
violation of Government Code Section 84200.

23 Count 6: The Committee and Song failed to timely file a pre-election campaign statement for the  
24 reporting period of January 1, 2020 to January 18, 2020, by the January 23, 2020 due date, in  
violation of Government Code Sections 84200.5 and 84200.8 and Regulation 18405.

25 Count 7: The Committee and Song failed to timely file a pre-election campaign statement for the  
26 reporting period of January 19, 2020 to February 15, 2020, by the February 20, 2020 due date,  
27 in violation of Government Code Sections 84200.5 and 84200.8 and Regulation 18405.

- 1 Count 8: The Committee and Song failed to timely file a semi-annual campaign statement for the  
2 reporting period of February 16, 2020 to June 30, 2020, by the July 31, 2020 due date, in  
violation of Government Code Section 84200.
- 3 Count 9: The Committee and Song failed to timely file a pre-election campaign statement for the  
4 reporting period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date, in  
violation of Government Code Sections 84200.5 and 84200.8.
- 5 Count 10: The Committee and Song failed to timely file a pre-election campaign statement for the  
6 reporting period of September 20, 2020 to October 17, 2020, by the October 22, 2020 due date,  
in violation of Government Code Sections 84200.5 and 84200.8.
- 7 Count 11: The Committee and Song failed to timely file a semi-annual campaign statement for the  
8 reporting period of January 1, 2021 to June 30, 2021, by the August 2, 2021 due date, in  
violation of Government Code Section 84200.
- 9 Count 12: The Committee and Song failed to timely file a semi-annual campaign statement for the  
10 reporting period of July 1, 2021 to December 31, 2021, by the January 31, 2022 due date, in  
violation of Government Code Section 84200.
- 11 Count 13: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
12 late monetary contribution, totaling \$4,410, received on August 6, 2020, by the August 7,  
2020 due date, in violation of Government Code Section 84203.
- 13 Count 14: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
14 late monetary contribution, totaling \$6,000, received on August 7, 2020, by the August 10,  
2020 due date, in violation of Government Code Section 84203.
- 15 Count 15: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
16 late monetary contribution, totaling \$10,000, received on September 25, 2020, by the  
September 28, 2020 due date, in violation of Government Code Section 84203.
- 17 Count 16: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose two  
18 late monetary contributions, totaling \$2,000, received on October 3, 2020, by the October 5,  
2020 due date, in violation of Government Code Section 84203.
- 19 Count 17: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
20 late non-monetary contribution, totaling \$22,440, received on October 5, 2020, by the  
October 7, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 21 Count 18: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
22 late non-monetary contribution, totaling \$40,000, received on October 8, 2020, by the  
October 12, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 23 Count 19: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
24 late non-monetary contribution, totaling \$4,000, received on October 11, 2020, by the  
October 13, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 25 Count 20: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
26 late non-monetary contribution, totaling \$22,440, received on October 13, 2020, by the  
October 15, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 27
- 28

1 Count 21: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
2 late non-monetary contribution, totaling \$15,088, received on October 15, 2020, by the  
October 19, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.

3 Count 22: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
4 late non-monetary contribution, totaling \$21,944, received on October 21, 2020, by the  
October 23, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.

5 Count 23: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
6 late non-monetary contribution, totaling \$21,937, received on October 26, 2020, by the  
October 28, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.

7 Additionally, after finding probable cause exists, the Enforcement Division requests an order by  
8 the Hearing Officer that an accusation be prepared against Song and the Committee and served upon  
9 them.<sup>3</sup>

10 A copy of this Request was mailed via U.S. Mail to Song, individually and on behalf of the  
11 Committee, on May 3, 2022 at the last known address, as follows:

12 **Anna Song**  
13 [REDACTED]  
14 [REDACTED]

15 Dated: May 2, 2022

Respectfully Submitted,

16 **FAIR POLITICAL PRACTICES COMMISSION**  
17 Angela J. Brereton  
Chief of Enforcement

18 *Jenna Rinehart*

19 \_\_\_\_\_  
20 By: Jenna C. Rinehart  
21 Commission Counsel  
22 Enforcement Division  
23  
24  
25  
26

27 \_\_\_\_\_  
28 <sup>3</sup> Gov. Code § 11503.



**Exhibit A-4**

1 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

2 STATE OF CALIFORNIA

3  
4 In the Matter of ) FPPC No. 20/950  
5 ANNA SONG and FRIENDS OF ANNA )  
6 SONG FOR COUNTY BOARD OF ) FINDING OF PROBABLE CAUSE AND  
7 EDUCATION FOR 2020, ) ORDER TO PREPARE AND SERVE AN  
8 Respondents. ) ACCUSATION  
9 ) Gov. Code § 83115.5

10 By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation  
11 be Prepared and Served (“Ex Parte Request”), the Enforcement Division submitted the above-entitled  
12 matter to the Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request,  
13 the Enforcement Division served a Report in Support of a Finding of Probable Cause (“PC Report”) on  
14 Respondents, Anna Song (“Song”) and Friends of Anna Song for County Board of Education for 2020  
15 (ID# 1241672) (the “Committee”) concerning this matter on April 1, 2022 by certified mail, return receipt  
16 requested. Accompanying the PC Report was a packet of materials that informed Respondents of their  
17 right to file a written response to the PC Report and to request a probable cause conference within 21 days  
18 following service of the PC Report, or transmittal of any requested records by the Enforcement Division.  
19 During the 21 days that followed service of the PC Report, Respondents did not file a response to the PC  
20 Report, request records, or request a probable cause conference. Pursuant to California Code of  
21 Regulations Title 2, Section 18361.4, determination of probable cause may be made solely on papers  
22 submitted when the respondent does not request a probable cause conference.<sup>1</sup>

23 In making a probable cause determination, it is the duty of the Hearing Officer of the Fair Political  
24 Practices Commission to determine whether probable cause exists to believe that a respondent violated  
25 the Political Reform Act as alleged by the Enforcement Division in the PC Report served on the  
26 respondent.

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

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

3 The PC Report served on Respondents and the subsequent Ex Parte Request in this matter allege  
4 23 violations of the Political Reform Act were committed, as follows:

5 Count 1: The Committee and Song failed to timely file a semi-annual campaign statement for the  
6 reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date, in  
7 violation of Government Code Section 84200.

8 Count 2: The Committee and Song failed to timely file a semi-annual campaign statement for the  
9 reporting period of January 1, 2018 to June 30, 2018, by the July 31, 2018 due date, in violation  
10 of Government Code Section 84200.

11 Count 3: The Committee and Song failed to timely file a semi-annual campaign statement for the  
12 reporting period of July 1, 2018 to December 31, 2018, by the January 31, 2019 due date, in  
13 violation of Government Code Section 84200.

14 Count 4: The Committee and Song failed to timely file a semi-annual campaign statement for the  
15 reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation  
16 of Government Code Section 84200.

17 Count 5: The Committee and Song failed to timely file a semi-annual campaign statement for the  
18 reporting period of July 1, 2019 to December 31, 2019, by the January 31, 2020 due date, in  
19 violation of Government Code Section 84200.

20 Count 6: The Committee and Song failed to timely file a pre-election campaign statement for the  
21 reporting period of January 1, 2020 to January 18, 2020, by the January 23, 2020 due date, in  
22 violation of Government Code Sections 84200.5 and 84200.8 and Regulation 18405.

23 Count 7: The Committee and Song failed to timely file a pre-election campaign statement for the  
24 reporting period of January 19, 2020 to February 15, 2020, by the February 20, 2020 due date,  
25 in violation of Government Code Sections 84200.5 and 84200.8 and Regulation 18405.

26 Count 8: The Committee and Song failed to timely file a semi-annual campaign statement for the  
27 reporting period of February 16, 2020 to June 30, 2020, by the July 31, 2020 due date, in  
28 violation of Government Code Section 84200.

Count 9: The Committee and Song failed to timely file a pre-election campaign statement for the  
reporting period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date,  
in violation of Government Code Sections 84200.5 and 84200.8.

Count 10: The Committee and Song failed to timely file a pre-election campaign statement for the  
reporting period of September 20, 2020 to October 17, 2020, by the October 22, 2020 due date,  
in violation of Government Code Sections 84200.5 and 84200.8.

Count 11: The Committee and Song failed to timely file a semi-annual campaign statement for the  
reporting period of January 1, 2021 to June 30, 2021, by the August 2, 2021 due date, in  
violation of Government Code Section 84200.

<sup>2</sup> Cal. Code Reg., Tit. 2, Section 18361.4, subd. (a).

- 1 Count 12: The Committee and Song failed to timely file a semi-annual campaign statement for the  
2 reporting period of July 1, 2021 to December 31, 2021, by the January 31, 2022 due date, in  
violation of Government Code Section 84200.
- 3 Count 13: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
4 late monetary contribution, totaling \$4,410, received on August 6, 2020, by the August 7,  
2020 due date, in violation of Government Code Section 84203.
- 5 Count 14: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
6 late monetary contribution, totaling \$6,000, received on August 7, 2020, by the August 10,  
2020 due date, in violation of Government Code Section 84203.
- 7 Count 15: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
8 late monetary contribution, totaling \$10,000, received on September 25, 2020, by the  
September 28, 2020 due date, in violation of Government Code Section 84203.
- 9 Count 16: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose two  
10 late monetary contributions, totaling \$2,000, received on October 3, 2020, by the October 5,  
2020 due date, in violation of Government Code Section 84203.
- 11 Count 17: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
12 late non-monetary contribution, totaling \$22,440, received on October 5, 2020, by the  
October 7, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 13 Count 18: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
14 late non-monetary contribution, totaling \$40,000, received on October 8, 2020, by the  
October 12, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 15 Count 19: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
16 late non-monetary contribution, totaling \$4,000, received on October 11, 2020, by the  
October 13, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 17 Count 20: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
18 late non-monetary contribution, totaling \$22,440, received on October 13, 2020, by the  
October 15, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 19 Count 21: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
20 late non-monetary contribution, totaling \$15,088, received on October 15, 2020, by the  
October 19, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 21 Count 22: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a  
22 late non-monetary contribution, totaling \$21,944, received on October 21, 2020, by the  
October 23, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.
- 23 Count 23: The Committee and Song failed to timely file a 24-Hour Contribution Report to disclose a late  
24 non-monetary contribution, totaling \$21,937, received on October 26, 2020, by the October  
28, 2020 due date, in violation of Government Code Sections 84203 and 84203.3.

25  
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**FPPC No. 20/950, In the matter of Anna Song and Friends of Anna Song for County Board of Education For 2020**

**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**

Anna Song, individually and o/b/o Friends of Anna Song for County Board of Education for 2020

**(By Personal Service) On Thursday, May 12, 2022, at approximately 3:00 p.m., I personally served:**

Jenna Rinehart, 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 May 12, 2022.

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

**Exhibit A-5**

1 ANGELA J. BRERETON  
Chief of Enforcement  
2 JENNA C. RINEHART  
Commission Counsel  
3 **FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q St, Suite 3000  
4 Sacramento, CA 95811  
Telephone: (916) 323-6302  
5 Email: JRinehart@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. 20/950  
12 )  
13 ANNA SONG and FRIENDS OF ANNA ) **ACCUSATION**  
14 SONG FOR COUNTY BOARD OF )  
EDUCATION FOR 2020 )  
15 Respondents. ) (Gov. Code §11503)  
16 )  
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, specifically  
25 including, but not limited to, Government Code Sections 83111, 83116, and 91000.5, which assign to the  
26 Enforcement Division the duty to administer, implement, and enforce the provisions of the Political  
27 Reform Act, found at Government Code Sections 81000 through 91014.

28 ///





1 **B. Duty to File Campaign Statements**

2 12. The Act requires candidates, committees, and treasurers to file campaign statements at  
3 specific times disclosing information regarding contributions received and expenditures made by the  
4 campaign committees.<sup>7</sup>

5 13. If the filing due date falls on a Saturday, Sunday, or official state holiday, then the filing  
6 due date for such a statement or report shall be extended to the next regular business day.<sup>8</sup> This extension  
7 does not apply to 24-Hour Contribution Reports when the due date for these types of reports falls on a  
8 Saturday, Sunday, or official state holiday immediately before an election.<sup>9</sup>

9 **C. Semi-Annual Campaign Statements**

10 14. Recipient committees shall file semi-annual campaign statements each year no later than  
11 July 31 for the period ending June 30, and no later than January 31 for the period ending December 31.<sup>10</sup>

12 **D. Pre-Election Campaign Statements**

13 15. All candidates appearing on the ballot at the next election, and their controlled committees,  
14 shall file pre-election campaign statements.<sup>11</sup>

15 16. The first pre-election campaign statement, for the period ending 45 days before the  
16 election, shall be filed no later than 40 days before the election.<sup>12</sup>

17 17. The second pre-election campaign statement, for the period ending 17 days before the  
18 election, shall be filed no later than 12 days before the election.<sup>13</sup>

19 18. If a candidate or elected officer controls more than one committee for the purpose of  
20 election to office, including committees established for a different elective office, the candidate or elected  
21 officer shall file campaign statements for each of these committees on the dates the candidate or elected  
22 officer is required to file pre-election campaign statements in connection with their election to office.<sup>14</sup>

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24  
25 <sup>7</sup> See Section 84200, *et seq.*

26 <sup>8</sup> Section 81005, subd. (a).

27 <sup>9</sup> Section 81005, subd. (b)(1).

28 <sup>10</sup> Section 84200, subd. (a).

<sup>11</sup> Section 84200.5, subd. (a).

<sup>12</sup> Section 84200.8, subd. (a).

<sup>13</sup> Section 84200.8, subd. (b).

<sup>14</sup> Regulation 18405, subd. (a).

1 **E. 24-Hour Contribution Reports**

2 19. A “late contribution” includes a contribution, including a loan, that totals in the aggregate  
3 \$1,000 or more and is made to or received by a candidate or a controlled committee during the 90-day  
4 period preceding the date of the election, or on the date of the election, at which the candidate is to be  
5 voted on.<sup>15</sup>

6 20. Each committee that receives a late contribution shall report the late contribution within 24  
7 hours of the time it is received.<sup>16</sup>

8 21. Each committee that receives a late non-monetary contribution shall report the late non-  
9 monetary contribution within 48 hours of the time it is received.<sup>17</sup>

10 **F. Terminating a Committee**

11 22. A treasurer of a recipient committee may terminate the committee’s status as a  
12 committee, only by completing the termination section on the statement of organization declaring, under  
13 penalty of perjury, that the committee: (1) has ceased to receive contributions and make expenditures;  
14 (2) has eliminated or has declared that it has no intention or ability to discharge all of its debts, loans  
15 received and other obligations; (3) has no surplus funds; and (4) has filed all required campaign  
16 statements disclosing all reportable transactions.<sup>18</sup>

17 **G. Factors to be Considered by the Fair Political Practices Commission**

18 23. In framing a proposed order following a finding of a violation pursuant to Government  
19 Code Section 83116, the Commission and the administrative law judge shall consider all the surrounding  
20 circumstances including but not limited to the following factors set forth in Regulation 18361.5  
21 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the specific  
22 violation; (2) The level of experience of the violator with the requirements of the Political Reform Act;  
23 (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of  
24 any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate, negligent or  
25 inadvertent; (6) Whether the violator demonstrated good faith by consulting the Commission staff or any

26  
27 <sup>15</sup> Section 82036, subd. (a).

<sup>16</sup> Section 84203, subd. (a).

<sup>17</sup> Section 84203.3, subd. (b).

<sup>18</sup> Regulation 18404, subd. (b).

1 other governmental agency in a manner not constituting complete defense under Government Code  
2 Section 83114(b); (7) Whether the violation was isolated or part of a pattern and whether the violator has  
3 a prior record of violations of the Political Reform Act or similar laws; and (8) Whether the violator, upon  
4 learning of a reporting violation, voluntarily filed amendments to provide full disclosure.<sup>19</sup>

5 **GENERAL FACTS**

6 24. Song was first elected to the Santa Clara County Board of Education in the November 7,  
7 2000 General Election and was reelected in 2004, 2008, 2012, and 2016.

8 25. Song was unsuccessful in the November 3, 2020 General Election, receiving 46.6% of the  
9 votes, and left office with the Santa Clara County Board of Education on December 11, 2020.

10 26. Song also appeared on the March 3, 2020 Primary Election ballot as a candidate for State  
11 Assembly, District 25.

12 27. Anna Song for Assembly 2020 (ID# 1418764) was Song's controlled committee for Song's  
13 State Assembly campaign.

14 28. Song was unsuccessful in the March 3, 2020 Primary Election for State Assembly receiving  
15 12.7% of the votes.

16 29. According to records obtained from the Secretary of State, the Committee qualified as a  
17 committee on October 30, 2000.

18 30. The Committee was redesignated for Song's 2020 Board of Education campaign on August  
19 6, 2020.

20 31. According to records obtained from the County of Santa Clara, between July 1, 2017 and  
21 December 31, 2020, the Committee reported approximately \$168,840 in contributions and \$147,840 in  
22 expenditures.

23 32. To date, the Committee remains open.

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<sup>19</sup> Regulation 18361.5, subdivision (e).

**Failure to Timely File Semi-Annual and Pre-Election Campaign Statements**

33. The Committee was required to file semi-annual campaign statements until the Committee was terminated.

34. Song appeared on the March 3, 2020 Primary Election ballot and on the November 3, 2020 General Election ballot; thus, the Committee was required to file pre-election campaign statements prior to each election.

35. Even though Song was a candidate for State Assembly, the Committee was required to file pre-election campaign statements prior to the March 3, 2020 Primary Election because Song appeared on the ballot.

36. According to the County of Santa Clara, the Committee filed or failed to file pre-election and semi-annual campaign statements as follows:

STATEMENT	REPORTING PERIOD	DUE DATE	DATE FILED	ACTIVITY REPORTED
Semi-Annual	07/01/2017 – 12/31/2017	01/31/2018	12/18/2018 (321 days late)	CTB: \$0 EXP: \$0
Semi-Annual	01/01/2018 – 06/30/2018	07/31/2018	12/18/2018 (140 days late)	CTB: \$0 EXP: \$0
Semi-Annual	07/01/2018 – 12/31/2018	01/31/2019	11/03/2020 (642 days late)	CTB: \$0 EXP: \$0
Semi-Annual	01/01/2019 – 06/30/2019	07/31/2019	11/03/2020 (461 days late)	CTB: \$0 EXP: \$0
Semi-Annual	07/01/2019 – 12/31/2019	01/31/2020	11/03/2020 (277 days late)	CTB: \$0 EXP: \$0
First Pre-Election	01/01/2020 – 01/18/2020	01/23/2020	11/03/2020 <sup>20</sup> (285 days late)	CTB: \$0 EXP: \$0
Second Pre-Election	01/19/2020 – 02/15/2020	02/20/2020	11/03/2020 (257 days late)	
Semi-Annual	02/16/2020 – 06/30/2020	07/31/2020	11/03/2020 (95 days late)	
First Pre-Election	07/01/2020 – 09/19/2020	09/24/2020	11/03/2020 (40 days late)	CTB: \$10,410 EXP: \$0
Second Pre-Election	09/20/2020 – 10/17/2020	10/22/2020	11/03/2020 (12 days late)	CTB: \$116,187 EXP: \$104,187
Semi-Annual	10/18/2020 – 12/31/2020	02/01/2021	01/29/2021	CTB: \$42,242 EXP: \$43,652
Semi-Annual	01/01/2021 – 06/30/2021	08/02/2021	Not Filed	Not Reported
Semi-Annual	07/01/2021 – 12/31/2021	01/31/2022	Not Filed	Not Reported

<sup>20</sup> Instead of filing pre-election campaign statements prior to the March 3, 2020 Primary Election, the Committee filed a semi-annual campaign statement for the reporting period of January 1, 2020 to June 30, 2020, on November 3, 2020.

1 37. The semi-annual campaign statement filed January 29, 2021, for the reporting period of  
2 October 18, 2020 to December 31, 2020, reported the Committee's ending cash balance as \$26,142.99.

3 38. As of the date of this Accusation, the Committee had not filed a statement of organization  
4 to terminate the Committee's status as a committee. Thus, the Committee is required to continue filing  
5 semi-annual campaign statements until the Committee is terminated.

6 39. As of the date of this Accusation, the Committee had not yet filed the campaign statements  
7 for the reporting periods ending June 30, 2021 and December 31, 2021.

8 **Failure to Timely File 24-Hour Contribution Reports**

9 40. Song appeared on the November 3, 2020 General Election ballot; thus, the Committee was  
10 required to timely file 24-Hour Contribution Reports within 24 hours of receiving a late monetary  
11 contribution or within 48 hours of receiving a late non-monetary contribution.

12 41. The 90-day period preceding the November 3, 2020 General Election began on August 5,  
13 2020.

14 42. The Committee's campaign statements reported late contributions and late non-monetary  
15 contributions received that were required to be disclosed on 24-Hour Contribution Reports.

16 43. According to the County of Santa Clara, the Committee filed 24-Hour Contribution Reports  
17 as follows:

18

DATE RECEIVED	CONTRIBUTOR	AMOUNT	DUE DATE	DATE FILED
08/06/2020	Anna Song	\$4,410	08/07/2020	11/03/2020 (88 days late)
08/07/2020	Charter Public Schools PAC	\$6,000	08/10/2020	11/03/2020 (85 days late)
09/25/2020	Santa Clara Charter Advocates for Great Schools	\$10,000	09/28/2020	11/03/2020 (36 days late)
10/03/2020	Preston Smith	\$1,000	10/05/2020	11/03/2020 (29 days late)
	Cheye Calvo	\$1,000		
10/05/2020	Charter Public Schools PAC	\$22,440*	10/07/2020	11/03/2020 (27 days late)
10/08/2020	Charter Public Schools PAC	\$40,000*	10/12/2020	11/03/2020 (22 days late)
10/11/2020	Charter Public Schools PAC	\$4,000*	10/13/2020	11/03/2020 (21 days late)
10/12/2020	Charter Public Schools PAC	\$219.72*	N/A	11/03/2020

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10/13/2020	Charter Public Schools PAC	\$22,440*	10/15/2020	11/03/2020 (19 days late)
10/15/2020	Charter Public Schools PAC	\$15,088*	10/19/2020	11/03/2020 (15 days late)
10/21/2020	Charter Public Schools PAC	\$21,944*	10/23/2020	11/03/2020 (11 days late)
10/26/2020	Charter Public Schools PAC	\$21,937*	10/28/2020	11/03/2020 (6 days late)
10/29/2020	Charter Public Schools PAC	\$460*	N/A	11/03/2020
11/03/2020	Champions for Education PAC	\$5,000	11/04/2020	11/03/2020

\*Disclosed as a non-monetary contribution to the Committee on campaign statements.

44. In summary, the Committee failed to timely file 24-Hour Contribution Reports for 12 late contributions or late non-monetary contributions received totaling \$170,259.

45. The Committee reported these late contributions or late non-monetary contributions on the date of the election on 24-Hour Contribution Reports.

46. The Charter Public Schools PAC (ID# 1302433) disclosed the late contributions it made to the Committee prior to the election on timely filed 24-Hour Contribution Reports.

### **PROCEDURAL HISTORY**

47. On October 30, 2020, the Enforcement Division filed a Complaint for Injunctive Relief and Monetary Penalties (“Injunction”) with the County of Santa Clara Superior Court. On or around November 20, 2020, the Enforcement Division requested for the Injunction to be dismissed because the Committee filed its outstanding campaign statements.

48. The Enforcement Division contacted Song at least 17 times in writing and 19 times via phone between November 4, 2019 and January 31, 2022 regarding the Committee’s outstanding campaign statements.

49. The Enforcement Division initiated an administrative action against the Committee and Song 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, selected regulations of the Commission regarding probable cause proceedings, and a probable cause checklist form.

50. Song was served with the PC Report, individually and on behalf of the Committee, via certified mail on April 1, 2022. The information contained in the PC Report packet advised the Committee

1 and Song that they had 21 days in which to request a probable cause conference, file a written response to  
2 the PC Report, or both. During the 21 days that followed service of the PC Report, the Committee and  
3 Song did not file a response to the PC Report or request a probable cause conference.

4 51. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an  
5 Accusation Be Prepared and Served (“Ex Parte Request”), dated May 2, 2022, the Enforcement Division  
6 submitted the matter to the Hearing Officer for a determination of probable cause.

7 52. On May 12, 2022, the Hearing Officer issued an order finding, based on the Ex Parte  
8 Request and the PC Report, that there was probable cause to believe the Committee and Song violated the  
9 Act and directed the Enforcement Division to issue an Accusation against the Committee and Song in  
10 accordance with the finding.

### 11 **VIOLATIONS**

12 53. The Committee and Song committed 23 violations of the Act as follows:

#### 13 **Count 1**

##### 14 **Failure to Timely File Semi-Annual Campaign Statement**

15 54. Complainant incorporates paragraphs 1 – 53 of this Accusation, as though completely set  
16 forth here.

17 55. The Committee and Song had a duty to timely file a semi-annual campaign statement for  
18 the reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date.

19 56. The Committee and Song failed to timely file a semi-annual campaign statement for the  
20 reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date.

21 57. By failing to timely file a semi-annual campaign statement by the January 31, 2018 due  
22 date, the Committee and Song violated Government Code Section 84200.

#### 23 **Count 2**

##### 24 **Failure to Timely File Semi-Annual Campaign Statement**

25 58. Complainant incorporates paragraphs 1 – 57 of this Accusation, as though completely set  
26 forth here.

27 59. The Committee and Song had a duty to timely file a semi-annual campaign statement for  
28 the reporting period of January 1, 2018 to June 30, 2018, by the July 31, 2018 due date.







1 **Count 8**

2 **Failure to Timely File Semi-Annual Campaign Statement**

3 82. Complainant incorporates paragraphs 1 – 81 of this Accusation, as though completely set  
4 forth here.

5 83. The Committee and Song had a duty to timely file a semi-annual campaign statement for  
6 the reporting period of February 16, 2020 to June 30, 2020, by the July 31, 2020 due date.

7 84. The Committee and Song failed to timely file the semi-annual campaign statement for the  
8 reporting period of February 16, 2020 to June 30, 2020, by the July 31, 2020 due date.

9 85. By failing to timely file a semi-annual campaign statement by the July 31, 2020 due date,  
10 the Committee and Song violated Government Code Section 84200.

11 **Count 9**

12 **Failure to Timely File Pre-Election Campaign Statement**

13 86. Complainant incorporates paragraphs 1 – 85 of this Accusation, as though completely set  
14 forth here.

15 87. The Committee and Song had a duty to timely file a pre-election campaign statement for  
16 the reporting period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date.

17 88. The Committee and Song failed to timely file a pre-election campaign statement for the  
18 reporting period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date.

19 89. By failing to timely file a pre-election campaign statement by the September 24, 2020 due  
20 date, the Committee and Song violated Government Code Sections 84200.5 and 84200.8.

21 **Count 10**

22 **Failure to Timely File Pre-Election Campaign Statement**

23 90. Complainant incorporates paragraphs 1 – 89 of this Accusation, as though completely set  
24 forth here.

25 91. The Committee and Song had a duty to timely file a pre-election campaign statement for  
26 the reporting period of September 20, 2020 to October 17, 2020, by the October 22, 2020 due date.

27 92. The Committee and Song failed to timely file a pre-election campaign statement for the  
28 reporting period of September 20, 2020 to October 17, 2020, by the October 22, 2020 due date.



1 104. The Committee and Song failed to timely file a 24-hour contribution report to disclose a  
2 late monetary contribution, totaling \$4,410, received on August 6, 2020, by the August 7, 2020 due date.

3 105. By failing to timely file a 24-hour contribution report by the August 7, 2020 due date, the  
4 Committee and Song violated Government Code Section 84203.

5 **Count 14**

6 **Failure to Timely File 24-Hour Contribution Report**

7 106. Complainant incorporates paragraphs 1 – 105 of this Accusation, as though completely set  
8 forth here.

9 107. The Committee and Song had a duty to timely file 24-hour contribution reports within 24  
10 hours of receiving a late monetary contribution.

11 108. The Committee and Song failed to timely file a 24-hour contribution report to disclose a  
12 late monetary contribution, totaling \$6,000, received on August 7, 2020, by the August 10, 2020 due date.

13 109. By failing to timely file a 24-hour contribution report by the August 10, 2020 due date, the  
14 Committee and Song violated Government Code Section 84203.

15 **Count 15**

16 **Failure to Timely File 24-Hour Contribution Report**

17 110. Complainant incorporates paragraphs 1 – 109 of this Accusation, as though completely set  
18 forth here.

19 111. The Committee and Song had a duty to timely file 24-hour contribution reports within 24  
20 hours of receiving a late monetary contribution.

21 112. The Committee and Song failed to timely file a 24-hour contribution report to disclose a  
22 late monetary contribution, totaling \$10,000, received on September 25, 2020, by the September 28, 2020  
23 due date.

24 113. By failing to timely file a 24-hour contribution report by the September 28, 2020 due date,  
25 the Committee and Song violated Government Code Section 84203.

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1 **Count 16**

2 **Failure to Timely File 24-Hour Contribution Report**

3 114. Complainant incorporates paragraphs 1 – 113 of this Accusation, as though completely set  
4 forth here.

5 115. The Committee and Song had a duty to timely file 24-hour contribution reports within 24  
6 hours of receiving a late monetary contribution.

7 116. The Committee and Song failed to timely file a 24-hour contribution report to disclose two  
8 late monetary contributions, totaling \$2,000, received on October 3, 2020, by the October 5, 2020 due  
9 date.

10 117. By failing to timely file a 24-hour contribution report by the October 5, 2020 due date, the  
11 Committee and Song violated Government Code Section 84203.

12 **Count 17**

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

14 118. Complainant incorporates paragraphs 1 – 117 of this Accusation, as though completely set  
15 forth here.

16 119. The Committee and Song had a duty to timely file 24-hour contribution reports within 48  
17 hours of receiving a late non-monetary contribution.

18 120. The Committee and Song failed to timely file a 24-hour contribution report to disclose a  
19 late non-monetary contribution, totaling \$22,440, received on October 5, 2020, by the October 7, 2020  
20 due date.

21 121. By failing to timely file a 24-hour contribution report by the October 7, 2020 due date, the  
22 Committee and Song violated Government Code Sections 84203 and 84203.3.

23 **Count 18**

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

25 122. Complainant incorporates paragraphs 1 – 121 of this Accusation, as though completely set  
26 forth here.

27 123. The Committee and Song had a duty to timely file 24-hour contribution reports within 48  
28 hours of receiving a late non-monetary contribution.



1 **Count 21**

2 **Failure to Timely File 24-Hour Contribution Report**

3 134. Complainant incorporates paragraphs 1 – 133 of this Accusation, as though completely set  
4 forth here.

5 135. The Committee and Song had a duty to timely file 24-hour contribution reports within 48  
6 hours of receiving a late non-monetary contribution.

7 136. The Committee and Song failed to timely file a 24-hour contribution report to disclose a  
8 late non-monetary contribution, totaling \$15,088, received on October 15, 2020, by the October 19, 2020  
9 due date.

10 137. By failing to timely file a 24-hour contribution report by the October 19, 2020 due date,  
11 the Committee and Song violated Government Code Sections 84203 and 84203.3.

12 **Count 22**

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

14 138. Complainant incorporates paragraphs 1 – 137 of this Accusation, as though completely set  
15 forth here.

16 139. The Committee and Song had a duty to timely file 24-hour contribution reports within 48  
17 hours of receiving a late non-monetary contribution.

18 140. The Committee and Song failed to timely file a 24-hour contribution report to disclose a  
19 late non-monetary contribution, totaling \$21,944, received on October 21, 2020, by the October 23, 2020  
20 due date.

21 141. By failing to timely file a 24-hour contribution report by the October 23, 2020 due date,  
22 the Committee and Song violated Government Code Sections 84203 and 84203.3.

23 **Count 23**

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

25 142. Complainant incorporates paragraphs 1 – 141 of this Accusation, as though completely set  
26 forth here.

27 143. The Committee and Song had a duty to timely file 24-hour contribution reports within 48  
28 hours of receiving a late non-monetary contribution.





2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 1**;
3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 2**;
4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 3**;
5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 4**;
6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 5**;
7. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 6**;
8. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 7**;
9. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 8**;
10. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 9**;

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

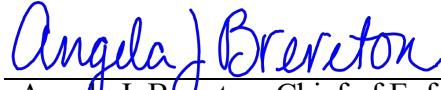
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- 1           20. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c),  
2           order the Committee and Song to pay a monetary penalty of up to \$5,000 for the violation  
3           of the Political Reform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

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

Dated: 8/5/2022

  
\_\_\_\_\_  
Angela J. Breton, Chief of Enforcement  
Fair Political Practices Commission

**Exhibit A-6**

<i>Attorney or Party without Attorney</i> Fair Political Practices Commission 1102 Q Street Suite 3000 Sacramento, CA 95811 Telephone No 916-327-6358			<i>For Court Use Only</i>	
<i>Attorney for</i> Plaintiff			Ref. No. or File No.	
<i>Insert name of Court, and Judicial District and Branch Court</i>				
<i>Plaintiff</i> <i>Defendant</i>				
<b>PROOF OF SERVICE</b>	<i>Hearing Date</i>	<i>Time</i>	<i>Dept/Div</i>	<i>Case Number</i>

1. *At the time of service I was at least 18 years of age and not a party to this action.*
2. I served copies of the Accusation
3. *a. Party served:* Anna Song  
*b. Person served:* Anna Song, Asian, Female, 50 Years Old, Black Hair, Brown Eyes, 5 Feet 2 Inches, 140 Pounds
4. *Address where the party was served:* 
5. *I served the party:*
  - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Tue., Aug. 16, 2022 (2) at: 8:11PM

**7. Person Who Served Papers:**

- a. Mariana Moreno
- b. Bender's Legal Service, Inc.**  
 1625 The Alameda  
 Suite 511  
 San Jose, CA 95126
- c. 408 286-4182, FAX 408 298-4484

Recoverable Cost Per CCP 1033.5(a)(4)(B)

- d. **The Fee for Service was:** \$65.00
- e. I am: (3) registered California process server
  - (i) Independent Contractor
  - (ii) *Registration No.:* PS1654
  - (iii) *County:* Santa Clara
  - (iv) *Expiration Date:* Sat, Jan. 13, 2024

8. *I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.*

*Date: Thu, Aug. 18, 2022*



**Exhibit A-7**





## FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3000 • Sacramento, CA 95811

### STATEMENT TO RESPONDENT

[Government Code Section 11505, subdivision (b)]

***Anna Song and Friends of Anna Song for County Board of Education for 2020  
FPPC Case No. 20/950***

Enclosed is an Accusation, which was filed with the Fair Political Practices Commission (the “FPPC”) and which is hereby served upon you, along with two copies of a Notice of Defense and Government Code Sections 11506 through 11508.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the FPPC within 15 days after the Accusation was served on you, the FPPC may proceed upon the Accusation without a hearing. The request for a hearing may be made by delivering or mailing the enclosed form entitled Notice of Defense, or by delivering or mailing a notice of defense as provided by Section 11506 of the Government Code to the Commission Assistant at the FPPC.

You may, but need not, be represented by counsel at any or all stages of these proceedings.

If you desire a list of the names and addresses of witnesses against you, or an opportunity to inspect and copy the items mentioned in Section 11507.6 of the Government Code that are in the possession, custody, or control of this agency, or if you wish to discuss the possibility of resolving this matter without a formal hearing, you may contact Jenna Rinehart, Commission Counsel, Enforcement Division, at (916) 323-6302 or at [JRinehart@fppc.ca.gov](mailto:JRinehart@fppc.ca.gov).

The hearing may be postponed for good cause. If you have good cause, you are obliged to notify the FPPC or, if an administrative law judge has been assigned to the hearing, the Office of Administrative Hearings, within 10 working days after you discover the good cause. Failure to give notice within 10 days will deprive you of a postponement.

After a hearing, the FPPC will consider the following factors in determining whether to assess a penalty (Title 2, California Code of Regulations, Section 18361.5, subdivision (e)):

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.



*Before the Fair Political Practices Commission*

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**State of California**

In the Matter of	)	NOTICE OF DEFENSE
	)	(Pursuant to Gov. Code § 11506)
	)	
ANNA SONG and FRIENDS OF	)	FPPC Case No. 20/950
ANNA SONG FOR COUNTY BOARD	)	
OF EDUCATION for 2020,	)	
	)	
	)	
Respondents.	)	
	)	

---

FRIENDS OF ANNA SONG FOR COUNTY BOARD OF EDUCATION FOR 2020, a respondent named in the above entitled proceeding, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

By law, this *NOTICE OF DEFENSE*, must be in writing and include your mailing address.

You may include your email address and telephone number and indicate if you agree to service by electronic means. If you wish to receive service through electronic means, you must complete and sign the Consent to Electronic Service Agreement (OAH 44). (Enclosed)

See information regarding the Office of Administrative Hearings Secure eFile Transfer (SFT) system at <https://www.dgs.ca.gov/OAH/Services/Page-Content/Office-of-Administrative-Hearings-Services-List-Folder/OAH-Secure-e-File-Information>

**GROUNDNS FOR NOTICE OF DEFENSE**

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
  - a) I admit the Accusation in whole.
  - b) I admit the Accusation in part as indicated below:

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- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: \_\_\_\_\_

\_\_\_\_\_

Respondent

\_\_\_\_\_

Print Name

\_\_\_\_\_

Mailing Address

\_\_\_\_\_

City, State, Zip

\_\_\_\_\_

Email address

\_\_\_\_\_

Phone number

- By checking this box, I agree to accept service using the OAH e-File Transfer System. I have enclosed the Consent to Electronic Service Agreement (OAH 44).



*Before the Fair Political Practices Commission*

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**State of California**

In the Matter of	)	NOTICE OF DEFENSE
	)	(Pursuant to Gov. Code § 11506)
	)	
ANNA SONG and FRIENDS OF	)	FPPC Case No. 20/950
ANNA SONG FOR COUNTY BOARD	)	
OF EDUCATION for 2020,	)	
	)	
	)	
Respondents.	)	
	)	

---

FRIENDS OF ANNA SONG FOR COUNTY BOARD OF EDUCATION FOR 2020, a respondent named in the above entitled proceeding, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

By law, this *NOTICE OF DEFENSE*, must be in writing and include your mailing address.

You may include your email address and telephone number and indicate if you agree to service by electronic means. If you wish to receive service through electronic means, you must complete and sign the Consent to Electronic Service Agreement (OAH 44). (Enclosed)

See information regarding the Office of Administrative Hearings Secure eFile Transfer (SFT) system at <https://www.dgs.ca.gov/OAH/Services/Page-Content/Office-of-Administrative-Hearings-Services-List-Folder/OAH-Secure-e-File-Information>

**GROUNDNS FOR NOTICE OF DEFENSE**

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
  - a) I admit the Accusation in whole.
  - b) I admit the Accusation in part as indicated below:

\_\_\_\_\_

\_\_\_\_\_

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- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Respondent

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Mailing Address

\_\_\_\_\_  
City, State, Zip

\_\_\_\_\_  
Email address

\_\_\_\_\_  
Phone number

- By checking this box, I agree to accept service using the OAH e-File Transfer System. I have enclosed the Consent to Electronic Service Agreement (OAH 44).



*Before the Fair Political Practices Commission*

---

**State of California**

In the Matter of	)	NOTICE OF DEFENSE
	)	(Pursuant to Gov. Code § 11506)
	)	
ANNA SONG and FRIENDS OF	)	FPPC Case No. 20/950
ANNA SONG FOR COUNTY BOARD	)	
OF EDUCATION for 2020,	)	
	)	
	)	
Respondents.	)	
	)	

---

ANNA SONG, a respondent named in the above entitled proceeding, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

By law, this *NOTICE OF DEFENSE*, must be in writing and include your mailing address.

You may include your email address and telephone number and indicate if you agree to service by electronic means. If you wish to receive service through electronic means, you must complete and sign the Consent to Electronic Service Agreement (OAH 44). (Enclosed)

See information regarding the Office of Administrative Hearings Secure eFile Transfer (SFT) system at <https://www.dgs.ca.gov/OAH/Services/Page-Content/Office-of-Administrative-Hearings-Services-List-Folder/OAH-Secure-e-File-Information>

**GROUNDNS FOR NOTICE OF DEFENSE**

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
  - a) I admit the Accusation in whole.
  - b) I admit the Accusation in part as indicated below:

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\_\_\_\_\_

\_\_\_\_\_

- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: \_\_\_\_\_

\_\_\_\_\_

Respondent

\_\_\_\_\_

Print Name

\_\_\_\_\_

Mailing Address

\_\_\_\_\_

City, State, Zip

\_\_\_\_\_

Email address

\_\_\_\_\_

Phone number

- By checking this box, I agree to accept service using the OAH e-File Transfer System. I have enclosed the Consent to Electronic Service Agreement (OAH 44).



*Before the Fair Political Practices Commission*

---

**State of California**

In the Matter of	)	NOTICE OF DEFENSE
	)	(Pursuant to Gov. Code § 11506)
	)	
ANNA SONG and FRIENDS OF	)	FPPC Case No. 20/950
ANNA SONG FOR COUNTY BOARD	)	
OF EDUCATION for 2020,	)	
	)	
	)	
Respondents.	)	
	)	

---

ANNA SONG, a respondent named in the above entitled proceeding, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

By law, this *NOTICE OF DEFENSE*, must be in writing and include your mailing address.

You may include your email address and telephone number and indicate if you agree to service by electronic means. If you wish to receive service through electronic means, you must complete and sign the Consent to Electronic Service Agreement (OAH 44). (Enclosed)

See information regarding the Office of Administrative Hearings Secure eFile Transfer (SFT) system at <https://www.dgs.ca.gov/OAH/Services/Page-Content/Office-of-Administrative-Hearings-Services-List-Folder/OAH-Secure-e-File-Information>



**GROUNDNS FOR NOTICE OF DEFENSE**

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
  - a) I admit the Accusation in whole.
  - b) I admit the Accusation in part as indicated below:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Respondent

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Mailing Address

\_\_\_\_\_  
City, State, Zip

\_\_\_\_\_  
Email address

\_\_\_\_\_  
Phone number

- By checking this box, I agree to accept service using the OAH e-File Transfer System. I have enclosed the Consent to Electronic Service Agreement (OAH 44).

# OFFICE OF ADMINISTRATIVE HEARINGS

## STATE OF CALIFORNIA

### Consent to Electronic Service (E-Service or "SFT") Agreement

Attention: In an effort to expedite the service of documents, the Office of Administrative Hearings (OAH) allows parties to receive documents electronically. By completing this form, you are agreeing to receive your documents from OAH by Secure e-File (SFT). You may access the OAH secure e-File system at <https://www.applications.dgs.ca.gov/oah/oahsftweb> to register for an account, if you have not done so already.

#### Instructions

1. Complete the form.
2. Requestor information. Enter the firm/agency name, requestor's name, telephone number and the program(s) to which this form will apply.
3. Method of Service. Select the method of service and complete the contact information as applicable. Remove previous names.
4. Terms and Conditions. Read the terms and conditions. Select a condition in which this form will apply. Complete the signature authorizing service of process.

5. Submit the completed form using the Office of Administrative Hearings Secure File Transfer System at: <https://www.applications.dgs.ca.gov/oah/oahsftweb>.

One agreement must be submitted per person, per LEA, or per Governmental Agency or Law Firm, as applicable.

# OFFICE OF ADMINISTRATIVE HEARINGS

## STATE OF CALIFORNIA

### Consent to Electronic Service (E-Service or "SFT") Agreement

#### Requestor Information

Full Name of Firm/Agency Requesting

Full Name of Person Requesting

Telephone Number

Please identify the program(s) to which this applies

#### Method of Service (Select ONE option)

**The Office of Administrative Hearings will serve your documents according to the option indicated below.**

Complete the information for the desired service option selected below.

Option #1 Secure e-File (SFT) Only

Option #2 U.S. Mail + Secure e-File (SFT)

Requestor's Email Address

Additional Email Addresses for Copies

Mailing Address (if mail option selected)

Remove the following additional email address(es) related to the attorney named above

Do not remove any names already in place

**Terms and Conditions (Select ONE option)**

By signing this form, you acknowledge and agree to receive documents from OAH according to the option selected above until notified otherwise. In the event that your contact information should change it is your responsibility to notify OAH.

I agree to accept service of documents from OAH by the option selected above for ALL current and future cases with OAH.

I no longer wish to participate in electronic service. Please cancel my previous agreement.

Requestor's Signature

By checking this box and typing my name below, I am electronically signing this agreement.

Date

Title of person making this request

**For multiple requestors, you may attach an additional sheet containing a list of each requestor's contact information and additional email address(es) to be applied to each requestor.**

**For E-filing <https://www.applications.dgs.ca.gov/oah/oahsftweb>**

# **OFFICE OF ADMINISTRATIVE HEARINGS**

## **STATE OF CALIFORNIA**

### **Privacy Notice**

This notice is provided pursuant to the Information Practices Act of 1977 (Civil Code, Section 1798 et seq.).

All information and records submitted to OAH may be subject to disclosure in accordance with the California Public Records Act (Government Code, Section 6250 et seq.), and other applicable authority unless expressly prohibited by law. Proceedings before OAH and records held by OAH are public unless otherwise provided by statute (Government Code, Section 11425.20). For example, the Family Educational Rights and Privacy Act (FERPA 20 United States Code Section 1232(g)) recognizes privacy rights to educational records in certain limited circumstances. It is the obligation of the parties to determine if case filings or proceedings require privacy protections. OAH cannot provide legal advice.

The Information Practices Act requires OAH to provide notice to individuals who submit personal information to OAH.

- 1) This notice does not apply to information provided by an agency or to routine contact information collected by OAH for the purpose of identification or communication regarding the case.
  
- 2) To the extent this form seeks information about a need for accommodation, OAH requests the information for the sole purpose of making a determination about the accommodation an individual is seeking. An individual seeking an accommodation is not required to use this form; it is provided as a convenience only. OAH can request this information in accordance with the Americans with Disabilities Act (42 United State Code Section 12101 et seq.).
  
- 3) Requests for Public Records or information maintained in accordance with the Information Practices Act shall be directed to the OAH Public Records Officer, 2349 Gateway Oaks Drive, Suite 200, Sacramento, CA 95833, (916) 263-0550, or OAHPR@[dgs.ca.gov](mailto:dgs.ca.gov).



# **California Government Code sections 11506 through 11508**

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## **§ 11506. Filing of notice of defense or notice of participation; Contents; Right to hearing on the merits**

(a) Within 15 days after service of the accusation or District Statement of Reduction in Force the respondent may file with the agency a notice of defense, or, as applicable, notice of participation, in which the respondent may:

(1) Request a hearing.

(2) Object to the accusation or District Statement of Reduction in Force upon the ground that it does not state acts or omissions upon which the agency may proceed.

(3) Object to the form of the accusation or District Statement of Reduction in Force on the ground that it is so indefinite or uncertain that the respondent cannot identify the transaction or prepare a defense.

(4) Admit the accusation or District Statement of Reduction in Force in whole or in part.

(5) Present new matter by way of defense.

(6) Object to the accusation or District Statement of Reduction in Force upon the ground that, under the circumstances, compliance with the requirements of a regulation would result in a material violation of another regulation enacted by another department affecting substantive rights.

(b) Within the time specified the respondent may file one or more notices of defense, or, as applicable, notices of participation, upon any or all of these grounds but all of these notices shall be filed within that period unless the agency in its discretion authorizes the filing of a later notice.

(c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense or notice of participation, and the notice shall be deemed a specific denial of all parts of the accusation or District Statement of Reduction in Force not expressly admitted. Failure to file a notice of defense or notice of participation shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing. Unless objection is taken as provided in paragraph (3) of subdivision (a), all objections to the form of the accusation or District Statement of Reduction in Force shall be deemed waived.

(d) The notice of defense or notice of participation shall be in writing signed by or on behalf of the respondent and shall state the respondent's mailing address. It need not be verified or follow any particular form.

(e) As used in this section, "file," "files," "filed," or "filing" means "delivered or mailed" to the agency as provided in Section 11505.

**HISTORY:** Added Stats 1945 ch 867 § 1. Amended Stats 1963 ch 931 § 1; Stats 1982 ch 606 § 1; Stats 1986 ch 951 § 20; Stats 1995 ch 938 § 29 (SB 523), operative July 1, 1997; Stats 2013 ch 90 § 5 (SB 546), effective January 1, 2014.

### **§ 11507. Amended or supplemental accusation or District Statement of Reduction in Force; Objections**

At any time before the matter is submitted for decision, the agency may file, or permit the filing of, an amended or supplemental accusation or District Statement of Reduction in Force. All parties shall be notified of the filing. If the amended or supplemental accusation or District Statement of Reduction in Force presents new charges, the agency shall afford the respondent a reasonable opportunity to prepare his or her defense to the new charges, but he or she shall not be entitled to file a further pleading unless the agency in its discretion so orders. Any new charges shall be deemed controverted, and any objections to the amended or supplemental accusation or District Statement of Reduction in Force may be made orally and shall be noted in the record.

**HISTORY:** Added Stats 1945 ch 867 § 1. Amended Stats 2013 ch 90 § 6 (SB 546), effective January 1, 2014; Stats 2014 ch 71 § 69 (SB 1304), effective January 1, 2015.

#### **§ 11507.3. Consolidated proceedings; Separate hearings**

(a) When proceedings that involve a common question of law or fact are pending, the administrative law judge on the judge's own motion or on motion of a party may order a joint hearing of any or all the matters at issue in the proceedings. The administrative law judge may order all the proceedings consolidated and may make orders concerning the procedure that may tend to avoid unnecessary costs or delay.

(b) The administrative law judge on the judge's own motion or on motion of a party, in furtherance of convenience or to avoid prejudice or when separate hearings will be conducive to expedition and economy, may order a separate hearing of any issue, including an issue raised in the notice of defense or notice of participation, or of any number of issues.

**HISTORY:** Added Stats 1995 ch 938 § 30 (SB 523), operative July 1, 1997. Amended Stats 2013 ch 90 § 7 (SB 546), effective January 1, 2014.

///

### **§ 11507.5. Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**HISTORY:** Added Stats 1968 ch 808 § 3.

### **§ 11507.6. Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

**HISTORY:** Added Stats 1968 ch 808 § 4. Amended Stats 1985 ch 1328 § 5; Stats 1995 ch 938 § 31 (SB 523), operative July 1, 1997.

**§ 11507.7. Motion to compel discovery; Order**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of *Section 915 of the Evidence Code* and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become

effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

**HISTORY:** Added Stats 1968 ch 808 § 5. Amended Stats 1971 ch 1303 § 8; Stats 1980 ch 548 § 2; Stats 1995 ch 938 § 32 (SB 523), operative July 1, 1997.

### **§ 11508. Time and place of hearing**

(a) The agency shall consult the office, and subject to the availability of its staff, shall determine the time and place of the hearing. The hearing shall be held at a hearing facility maintained by the office in Sacramento, Oakland, Los Angeles, or San Diego and shall be held at the facility that is closest to the location where the transaction occurred or the respondent resides.

(b) Notwithstanding subdivision (a), the hearing may be held at either of the following places:

(1) A place selected by the agency that is closer to the location where the transaction occurred or the respondent resides.

(2) A place within the state selected by agreement of the parties.

(c) The respondent may move for, and the administrative law judge has discretion to grant or deny, a change in the place of the hearing. A motion for a change in the place of the hearing shall be made within 10 days after service of the notice of hearing on the respondent.

Unless good cause is identified in writing by the administrative law judge, hearings shall be held in a facility maintained by the office.

**HISTORY:** Added Stats 1945 ch 867 § 1. Amended Stats 1963 ch 710 § 1; Stats 1967 ch 17 § 39; Stats 1987 ch 50 § 1; Stats 1995 ch 938 § 33 (SB 523), operative July 1, 1997; Stats 2005 ch 674 § 22 (SB 231), effective January 1, 2006.

## 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, California 95811. On August 8, 2022, I served the following document(s):

1. Statement to Respondent;
2. FPPC Case No. 20/950: Accusation;
3. Notice of Defense for Anna Song (Two Copies);
4. Notice of Defense for Friends of Anna Song for County Board of Education for 2020 (Two Copies);
5. Consent to Electronic Service Agreement;
6. Selected Sections of the California Government Code, Administrative Procedure Act.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By personal service. At 11:35 (a.m./p.m.):

I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

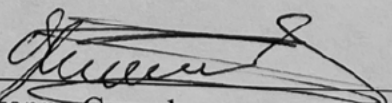
By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

### SERVICE LIST

Anna Song  
[REDACTED]

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 8, 2022.

  
\_\_\_\_\_  
Suzanna Gevorkyan

**Exhibit A-8**

SUBSCRIBE



DONATE



# Anna Song

**Anna Song** was a member of the Santa Clara County Board of Education in California, representing Trustee Area 5. She left office on December 11, 2020.

Song (Democratic Party) ran for election to the California State Assembly to represent District 25. She lost in the primary on March 3, 2020.

Song also ran for re-election to the Santa Clara County Board of Education to represent Trustee Area 5 in California. She lost in the general election on November 3, 2020.

Song completed Ballotpedia's Candidate Connection survey in 2020. [Click here to read the survey answers.](#)



This page was current at the end of the official's last term in office covered by Ballotpedia. Please contact us with any updates.

## Anna Song



Do you have a photo that could go here? [Click here](#) to submit it for this profile!

### Prior offices

#### **Santa Clara County Board of Education Trustee Area 5**

Successor: Victoria Chon

*Report an officeholder change*

### **Elections and appointments**

**Last election** November 3, 2020

### **Education**

**Bachelor's** Franciscan University, 1994

### **Personal**

**Religion** Catholic

**Profession** Mental Health Counselor

## Biography

Anna Song was born in Korea. She earned a bachelor's degree in theology from Franciscan University in 1994. Song's career experience includes working as a counselor, Fair Housing Specialist, and as an insurance agent.<sup>[1]</sup>

## Elections

### 2020

#### **Santa Clara County Board of Education**





See also: *Municipal elections in Santa Clara County, California (2020)*

**Contact**  
**Personal Facebook**  
**Personal LinkedIn**

## General election

General election for Santa Clara County Board of Education Trustee Area 5

Victoria Chon defeated incumbent Anna Song in the general election for Santa Clara County Board of Education Trustee Area 5 on November 3, 2020.

	Candidate	%	Votes
✓ 	Victoria Chon (Nonpartisan)	53.4	48,532
	<b><u>Anna Song</u></b> (Nonpartisan)	46.6	42,296

**BP** Incumbents are **bolded and underlined**. The results have been certified. Source

Total votes: 90,828

Do you want a spreadsheet of this type of data? Contact our sales team.




## California State Assembly

See also: *California State Assembly elections, 2020*

## General election

General election for California State Assembly District 25

Alex Lee defeated Bob Brunton in the general election for California State Assembly District 25 on November 3, 2020.

	Candidate	%	Votes
✓ 	Alex Lee (D) 	70.5	135,733
	Bob Brunton (R)	29.5	56,775

**BP** There were no incumbents in this race. The results have been certified. Source

Total votes: 192,508














 = candidate completed the Ballotpedia Candidate Connection survey.

Do you want a spreadsheet of this type of data? Contact our sales team.

## Nonpartisan primary election

### Nonpartisan primary for California State Assembly District 25

The following candidates ran in the primary for California State Assembly District 25 on March 3, 2020.

	Candidate	%	Votes
✓	 Bob Brunton (R)	20.8	19,612
✓	 Alex Lee (D) 	15.4	14,542
	 Anne Kepner (D)	13.6	12,823
	 Anna Song (D) 	12.7	11,992
	 Natasha Gupta (D)	10.4	9,778
	 Carmen Montano (D)	10.2	9,672
	 Anthony Phan (D) 	7.2	6,780
	 Roman Reed (D) 	5.9	5,549
	 Jim Canova (D)	3.8	3,623

**BP** There were no incumbents in this race. The results have been certified. Source

Total votes: 94,371

 = candidate completed the Ballotpedia Candidate Connection survey.

Do you want a spreadsheet of this type of data? Contact our sales team.

**Exhibit A-9**

**Statement of Organization  
Recipient Committee**

Statement Type

Initial  
 Not yet qualified  
 Date qualification threshold met  
 Amendment  
 Termination - See Part 5  
 Date of termination

**1. Committee Information**

I.D. Number (if applicable) 1241672

NAME OF COMMITTEE

Friends of Anna Song for County BOE 2020

STREET ADDRESS (NO P.O. BOX)  
[REDACTED]

CITY Santa Clara STATE CA ZIP CODE 95051 AREA CODE/PHONE (650) 906-7587

FULL MAILING ADDRESS (IF DIFFERENT)  
Same as above

E-MAIL ADDRESS (REGULATORY AND PROFESSIONAL USE ONLY)  
[REDACTED]

COUNTY OF DOMICILE Santa Clara JURISDICTION WHERE COMMITTEE IS ACTIVE Santa Clara County

**2. Treasurer and Other Principal Officers**

NAME OF TREASURER

Anna Song

CITY Santa Clara STATE CA ZIP CODE 95051 AREA CODE/PHONE (650) 906-7587

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

NAME OF PRINCIPAL OFFICER(S)

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

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 Aug 4, 2020 BY [Signature] SIGNATURE OF TREASURER OR ASSISTANT TREASURER  
 Executed on Aug 4, 2020 BY [Signature] SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROPONENT  
 Executed on \_\_\_\_\_ BY \_\_\_\_\_ SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROPONENT  
 Executed on \_\_\_\_\_ BY \_\_\_\_\_ SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Date Stamp  
**FILE**  
AUG 06 2020  
REGISTRAR OF VOTERS  
COUNTY OF SANTA CLARA

**CALIFORNIA 410**  
FORM  
For Official Use Only

**Exhibit A-10**

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
12/18/2018  
14:00:08

Filing ID:  
175154660

Statement covers period

from 07/01/2017

through 12/31/2017

Date of election if applicable:  
(Month, Day, Year)

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
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Santa Clara	CA	95051	(650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Santa Clara	CA	95051	(650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 12/18/2018  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 12/18/2018  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>07/01/2017</u>	<b>CALIFORNIA FORM 460</b>
through <u>12/31/2017</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5,142.99</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>0.00</u>
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## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
12/18/2018  
14:03:29

Filing ID:  
175154710

Statement covers period

from 01/01/2018

through 06/30/2018

Date of election if applicable:  
(Month, Day, Year)

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
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 12/18/2018  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 12/18/2018  
Date

By Anna Song  
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



# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>01/01/2018</u>	<b>CALIFORNIA FORM 460</b>
through <u>06/30/2018</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5,142.99</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>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/03/2020  
10:18:45  
  
Filing ID:  
194166052

<b>Statement covers period</b> <b>from</b> <u>07/01/2018</u> <b>through</b> <u>12/31/2018</u>	<b>Date of election if applicable:</b> (Month, Day, Year) _____
---	---

SEE INSTRUCTIONS ON REVERSE

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

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

**2. Type of Statement:**

- |   |   |
|---|---|
| <input type="checkbox"/> Preelection Statement  | <input type="checkbox"/> Quarterly Statement                                  |
| <input checked="" type="checkbox"/> Semi-annual Statement                                   | <input type="checkbox"/> Special Odd-Year Report                              |
| <input type="checkbox"/> Termination Statement<br><i>(Also file a Form 410 Termination)</i> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below)  |   |

**3. Committee Information**

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

**Treasurer(s)**

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/03/2020  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/03/2020  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>07/01/2018</u>	<b>CALIFORNIA FORM 460</b>
through <u>12/31/2018</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5,142.99</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>0.00</u>
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## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/03/2020  
10:22:16

Filing ID:  
194166145

Statement covers period

from 01/01/2019

through 06/30/2019

Date of election if applicable:  
(Month, Day, Year)

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
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Santa Clara	CA	95051	(650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Santa Clara	CA	95051	(650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/03/2020  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/03/2020  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>01/01/2019</u>	<b>CALIFORNIA FORM 460</b>
through <u>06/30/2019</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5,142.99</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>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/03/2020  
10:24:14  
Filing ID:  
194166259

<b>Statement covers period</b> from <u>07/01/2019</u>  through <u>12/31/2019</u>	<b>Date of election if applicable:</b> (Month, Day, Year) _____
---	---

SEE INSTRUCTIONS ON REVERSE

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

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

### 2. Type of Statement:

- |  |   |
|--|---|
| <input type="checkbox"/> Preelection Statement                                       | <input type="checkbox"/> Quarterly Statement                                  |
| <input checked="" type="checkbox"/> Semi-annual Statement                            | <input type="checkbox"/> Special Odd-Year Report                              |
| <input type="checkbox"/> Termination Statement<br>(Also file a Form 410 Termination) | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below)                                   |   |

### 3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

### Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/03/2020  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/03/2020  
Date

By Anna Song  
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

**Campaign Disclosure Statement  
Summary Page**

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>07/01/2019</u>	<b>CALIFORNIA FORM 460</b>
through <u>12/31/2019</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

**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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5,142.99</u>

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

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.

17. LOAN GUARANTEES RECEIVED ..... Schedule B, Part 2	\$ <u>0.00</u>
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**Cash Equivalents and Outstanding Debts**

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/03/2020  
10:25:45

Filing ID:  
194166312

<b>Statement covers period</b> from 01/01/2020 through 06/30/2020	<b>Date of election if applicable:</b> (Month, Day, Year) _____
---	---

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
- Supplemental Preelection Statement - Attach Form 495

### 3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Santa Clara	CA	95051	(650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

### Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Santa Clara	CA	95051	(650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/03/2020  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/03/2020  
Date

By Anna Song  
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



# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>01/01/2020</u>	<b>CALIFORNIA FORM 460</b>
through <u>06/30/2020</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>5,142.99</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>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>

**Exhibit A-11**

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

COVER PAGE

CALIFORNIA FORM **460**

Date Stamp

E-Filed  
11/03/2020  
11:23:14

Filing ID:  
194168320

Page 1 of 6

For Official Use Only

<b>Statement covers period</b> from <u>07/01/2020</u>  through <u>09/19/2020</u>	<b>Date of election if applicable:</b> (Month, Day, Year)  <u>11/03/2020</u>
---	---

SEE INSTRUCTIONS ON REVERSE

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

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

### 2. Type of Statement:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Preelection Statement<br><input type="checkbox"/> Semi-annual Statement<br><input type="checkbox"/> Termination Statement<br>(Also file a Form 410 Termination)<br><input type="checkbox"/> Amendment (Explain below) | <input type="checkbox"/> Quarterly Statement<br><input type="checkbox"/> Special Odd-Year Report<br><input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
|---|---|

### 3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

### Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/03/2020  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/03/2020  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>07/01/2020</u>	<b>CALIFORNIA FORM 460</b>
through <u>09/19/2020</u>	
Page <u>3</u> of <u>6</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>6,000.00</u>	\$ <u>6,000.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>4,410.00</u>	<u>9,552.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>10,410.00</u>	\$ <u>15,552.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>10,410.00</u>	\$ <u>15,552.99</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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>5,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>10,410.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>15,552.99</u>

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

17. LOAN GUARANTEES RECEIVED ..... Schedule B, Part 2	\$ <u>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>9,552.99</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.

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/03/2020  
11:27:05

Filing ID:  
194168418

<b>Statement covers period</b> from <u>09/20/2020</u>  through <u>10/17/2020</u>	<b>Date of election if applicable:</b> (Month, Day, Year)  <u>11/03/2020</u>
---	---

SEE INSTRUCTIONS ON REVERSE

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

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

### 2. Type of Statement:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Preelection Statement<br><input type="checkbox"/> Semi-annual Statement<br><input type="checkbox"/> Termination Statement<br>(Also file a Form 410 Termination)<br><input type="checkbox"/> Amendment (Explain below) | <input type="checkbox"/> Quarterly Statement<br><input type="checkbox"/> Special Odd-Year Report<br><input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
|---|---|

### 3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

### Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/03/2020  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/03/2020  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>09/20/2020</u>	<b>CALIFORNIA FORM 460</b>
through <u>10/17/2020</u>	
Page <u>3</u> of <u>8</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>12,000.00</u>	\$ <u>18,000.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>9,552.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>12,000.00</u>	\$ <u>27,552.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>104,187.72</u>	<u>104,187.72</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>116,187.72</u>	\$ <u>131,740.71</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>104,187.72</u>	<u>104,187.72</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>104,187.72</u>	\$ <u>104,187.72</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> / <u>   </u>	\$ _____
<u>   </u> / <u>   </u> / <u>   </u>	\$ _____

## Current Cash Statement

12. Beginning Cash Balance ..... Previous Summary Page, Line 16	\$ <u>15,552.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>12,000.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>27,552.99</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).

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

17. LOAN GUARANTEES RECEIVED ..... Schedule B, Part 2	\$ <u>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>9,552.99</u>

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

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
01/29/2021  
13:56:07

Filing ID:  
196525185

<b>Statement covers period</b> from <u>10/18/2020</u>  through <u>12/31/2020</u>	<b>Date of election if applicable:</b> (Month, Day, Year)  <u>11/03/2020</u>
---	---

SEE INSTRUCTIONS ON REVERSE

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

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

### 2. Type of Statement:

- |  |   |
|--|---|
| <input type="checkbox"/> Preelection Statement                                       | <input type="checkbox"/> Quarterly Statement                                  |
| <input checked="" type="checkbox"/> Semi-annual Statement                            | <input type="checkbox"/> Special Odd-Year Report                              |
| <input type="checkbox"/> Termination Statement<br>(Also file a Form 410 Termination) | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below)                                   |   |

### 3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

### Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
<u>Santa Clara</u>	<u>CA</u>	<u>95051</u>	<u>(650)906-7587</u>

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 01/29/2021  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 01/29/2021  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>10/18/2020</u>	<b>CALIFORNIA FORM 460</b>
through <u>12/31/2020</u>	
Page <u>3</u> of <u>7</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>3,000.00</u>	\$ <u>21,000.00</u>
2. Loans Received ..... Schedule B, Line 3	\$ <u>-4,410.00</u>	\$ <u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>-1,410.00</u>	\$ <u>26,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	\$ <u>43,652.65</u>	\$ <u>147,840.37</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>42,242.65</u>	\$ <u>173,983.36</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	\$ <u>0.00</u>	\$ <u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	\$ <u>0.00</u>	\$ <u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	\$ <u>43,652.65</u>	\$ <u>147,840.37</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>43,652.65</u>	\$ <u>147,840.37</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>27,552.99</u>
13. Cash Receipts ..... Column A, Line 3 above	\$ <u>-1,410.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	\$ <u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	\$ <u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>26,142.99</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>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</u>



**Exhibit A-12**

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

COVER PAGE

CALIFORNIA FORM **460**

Date Stamp

E-Filed  
11/15/2022  
14:44:22

Filing ID:  
205592335

Page 1 of 5

For Official Use Only

### Statement covers period

from 01/01/2021

through 06/30/2021

### Date of election if applicable: (Month, Day, Year)

11/03/2020

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  
 Supplemental Preelection Statement - Attach Form 495

## 3. Committee Information

I.D. NUMBER

1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Friends of Anna Song for County Board of Education 2012

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

annasong@aol.com

## Treasurer(s)

NAME OF TREASURER

Anna Song

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS

annasong@aol.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 11/15/2022  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/15/2022  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>01/01/2021</u>	<b>CALIFORNIA FORM 460</b>
through <u>06/30/2021</u>	
Page <u>3</u> of <u>5</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>5,142.99</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>5,142.99</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>5,142.99</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>4,392.99</u>	\$ <u>4,392.99</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>4,392.99</u>	\$ <u>4,392.99</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>4,392.99</u>	\$ <u>4,392.99</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>26,142.99</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>4,392.99</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>21,750.00</u>

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

17. LOAN GUARANTEES RECEIVED ..... Schedule B, Part 2	\$ <u>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>5,142.99</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.

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/15/2022  
18:41:16

Filing ID:  
205593661

Statement covers period

from 07/01/2021

through 12/31/2021

Date of election if applicable:  
(Month, Day, Year)

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
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2020

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/15/2022  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/15/2022  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>07/01/2021</u>	<b>CALIFORNIA FORM 460</b>
through <u>12/31/2021</u>	
Page <u>3</u> of <u>5</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2020

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>750.00</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>750.00</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>750.00</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>1,320.00</u>	\$ <u>1,320.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>1,320.00</u>	\$ <u>1,320.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>1,320.00</u>	\$ <u>1,320.00</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>12,947.09</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>1,320.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>11,627.09</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>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>750.00</u>

# Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Date Stamp

E-Filed  
11/15/2022  
18:46:31

Filing ID:  
205593706

Statement covers period

from 01/01/2022

through 06/30/2022

Date of election if applicable:  
(Month, Day, Year)

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
- Supplemental Preelection Statement - Attach Form 495

3. Committee Information

I.D. NUMBER  
1241672

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)  
Friends of Anna Song for County Board of Education 2020

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.com

Treasurer(s)

NAME OF TREASURER  
Anna Song

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE  
Santa Clara CA 95051 (650)906-7587

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX / E-MAIL ADDRESS  
annasong@aol.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 11/15/2022  
Date

By Anna Song  
Signature of Treasurer or Assistant Treasurer

Executed on 11/15/2022  
Date

By Anna Song  
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

# Campaign Disclosure Statement Summary Page

SUMMARY PAGE

Amounts may be rounded  
to whole dollars.

Statement covers period from <u>01/01/2022</u>	<b>CALIFORNIA FORM 460</b>
through <u>06/30/2022</u>	
Page <u>3</u> of <u>4</u>	I.D. NUMBER <u>1241672</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Friends of Anna Song for County Board of Education 2020

## 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>0.00</u>	\$ <u>0.00</u>
2. Loans Received ..... Schedule B, Line 3	<u>0.00</u>	<u>750.00</u>
3. SUBTOTAL CASH CONTRIBUTIONS ..... Add Lines 1 + 2	\$ <u>0.00</u>	\$ <u>750.00</u>
4. Nonmonetary Contributions ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
5. TOTAL CONTRIBUTIONS RECEIVED ..... Add Lines 3 + 4	\$ <u>0.00</u>	\$ <u>750.00</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>0.00</u>	\$ <u>0.00</u>
7. Loans Made ..... Schedule H, Line 3	<u>0.00</u>	<u>0.00</u>
8. SUBTOTAL CASH PAYMENTS ..... Add Lines 6 + 7	\$ <u>0.00</u>	\$ <u>0.00</u>
9. Accrued Expenses (Unpaid Bills) ..... Schedule F, Line 3	<u>0.00</u>	<u>0.00</u>
10. Nonmonetary Adjustment ..... Schedule C, Line 3	<u>0.00</u>	<u>0.00</u>
11. TOTAL EXPENDITURES MADE ..... Add Lines 8 + 9 + 10	\$ <u>0.00</u>	\$ <u>0.00</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> / <u>  </u>	\$ _____
<u>  </u> / <u>  </u> / <u>  </u>	\$ _____

## Current Cash Statement

12. Beginning Cash Balance ..... Previous Summary Page, Line 16	\$ <u>11,627.09</u>
13. Cash Receipts ..... Column A, Line 3 above	<u>0.00</u>
14. Miscellaneous Increases to Cash ..... Schedule I, Line 4	<u>0.00</u>
15. Cash Payments ..... Column A, Line 8 above	<u>0.00</u>
16. <b>ENDING CASH BALANCE</b> ..... Add Lines 12 + 13 + 14, then subtract Line 15	\$ <u>11,627.09</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>0.00</u>
---	----------------

## Cash Equivalents and Outstanding Debts

18. Cash Equivalents ..... See instructions on reverse	\$ <u>0.00</u>
19. Outstanding Debts ..... Add Line 2 + Line 9 in Column B above	\$ <u>750.00</u>

**Exhibit A-13**



# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012		<b>Date of This Filing</b> 11/03/2020	<b>Date Stamp</b>	<div style="border: 2px solid black; padding: 5px; color: red; font-weight: bold;"> E-Filed 11/03/2020 02:33:11  Filing ID: 194160048 </div>	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b> (650) 906-7587	<b>I.D. NUMBER (if applicable)</b> 1241672	<b>Report No.</b> 1			
<b>STREET ADDRESS</b>		<input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)			
<b>CITY</b> Santa Clara	<b>STATE</b> CA	<b>ZIP CODE</b> 95051			
		<b>No. of Pages</b> 5			

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
08/06/2020	Anna Song Santa Clara, CA 95051	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		4,410.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
08/07/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		6,000.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
09/25/2020	Santa Clara Charter Advocates for Great Schools Sacramento, CA 95815	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		10,000.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate

\*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

Reason for Amendment: \_\_\_\_\_

# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012			<b>Date of This Filing</b> <u>11/03/2020</u>	Date Stamp     Report No. <u>1</u>  <input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)  No. of Pages <u>5</u>	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b> (650) 906-7587	<b>I.D. NUMBER (if applicable)</b> 1241672				
<b>STREET ADDRESS</b> _____ _____					
<b>CITY</b> Santa Clara	<b>STATE</b> CA	<b>ZIP CODE</b> 95051			

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
10/03/2020	Preston Smith San Jose, CA 95121	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	CEO Rocketship Charter Schools	1,000.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
10/05/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		22,440.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
10/08/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		40,000.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate

Reason for Amendment: \_\_\_\_\_

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 PTY – Political Party  
 SCC – Small Contributor Committee

# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012			<b>Date of This Filing</b> <u>11/03/2020</u>	Date Stamp	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b> (650) 906-7587	<b>I.D. NUMBER (if applicable)</b> 1241672		<b>Report No.</b> <u>1</u>		
<b>STREET ADDRESS</b>			<input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)		
<b>CITY</b> Santa Clara	<b>STATE</b> CA	<b>ZIP CODE</b> 95051	<b>No. of Pages</b> <u>5</u>		

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
10/11/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		4,000.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
10/12/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		219.72  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
10/13/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		22,440.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate

Reason for Amendment: \_\_\_\_\_

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 SCC – Small Contributor Committee

# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012			<b>Date of This Filing</b> <u>11/03/2020</u>	Date Stamp	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b> (650) 906-7587	<b>I.D. NUMBER (if applicable)</b> 1241672		<b>Report No.</b> <u>1</u>		
<b>STREET ADDRESS</b>			<input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)		
<b>CITY</b> Santa Clara	<b>STATE</b> CA	<b>ZIP CODE</b> 95051	<b>No. of Pages</b> <u>5</u>		

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
10/15/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		15,088.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
10/21/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		21,944.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
10/26/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		21,937.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate

Reason for Amendment: \_\_\_\_\_

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# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012			<b>Date of This Filing</b> <u>11/03/2020</u>	Date Stamp	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b> (650) 906-7587	<b>I.D. NUMBER (if applicable)</b> 1241672		<b>Report No.</b> <u>1</u>		
<b>STREET ADDRESS</b> _____			<input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)		
<b>CITY</b> Santa Clara	<b>STATE</b> CA	<b>ZIP CODE</b> 95051	<b>No. of Pages</b> <u>5</u>		

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
10/29/2020	Charter Public Schools PAC Sacramento, CA 95814	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		600.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan  _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan  _____% Provide interest rate

Reason for Amendment: \_\_\_\_\_

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# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012			<b>Date of This Filing</b> <u>11/03/2020</u>	Date Stamp <div style="border: 1px solid red; padding: 5px; text-align: center; color: red;">                     E-Filed                      11/03/2020                      10:56:21                       Filing ID:                      194167289                 </div>	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b> (650) 906-7587	<b>I.D. NUMBER (if applicable)</b> 1241672		<b>Report No.</b> <u>2</u>		
<b>STREET ADDRESS</b> _____			<input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)		
<b>CITY</b> Santa Clara	<b>STATE</b> CA	<b>ZIP CODE</b> 95051	<b>No. of Pages</b> <u>2</u>		

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
10/03/2020	Mr. Cheye Calvo San Jose, CA 95112	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Chief Community Engagement Officer Rocketship Public Schools	1,000.00  <input type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		<input type="checkbox"/> Check if Loan _____% Provide interest rate

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Reason for Amendment: \_\_\_\_\_

**Additional Comments**  
**Form 497 Contribution Report**

ADDITIONAL COMMENTS

**CALIFORNIA**  
**FORM** **497**

Page   2   of   2  

NAME OF FILER

Friends of Anna Song for County Board of Education 2012

I.D. NUMBER

1241672

I have added Mr. Cheye Calvo in the system without a dollar amount in my previous report.

# 497 Contribution Report

Amounts may be rounded to whole dollars.

497 CONTRIBUTION REPORT

<b>NAME OF FILER</b> Friends of Anna Song for County Board of Education 2012		<b>Date of This Filing</b> <u>11/03/2020</u>	<b>Date Stamp</b>  <div style="border: 1px solid red; padding: 5px; width: fit-content; margin: auto;">                     E-Filed                      11/03/2020                      14:42:49                       Filing ID:                      194175972                 </div>	<b>CALIFORNIA FORM 497</b> For Official Use Only
<b>AREA CODE/PHONE NUMBER</b>  (650) 906-7587	<b>I.D. NUMBER (if applicable)</b>  1241672	<b>Report No.</b> <u>3</u>		
<b>STREET ADDRESS</b>  _____		<input type="checkbox"/> <b>Amendment to Report No.</b> _____ (explain below)		
<b>CITY</b>  Santa Clara	<b>STATE</b>  CA	<b>ZIP CODE</b>  95051	<b>No. of Pages</b> <u>1</u>	

## 1. Contribution(s) Received

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR <small>(IF COMMITTEE, ALSO ENTER I.D. NUMBER)</small>	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT RECEIVED
11/03/2020	Champions for Education PAC Sacramento, CA 95815	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		5,000.00  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		  <input type="checkbox"/> Check if Loan  _____% Provide interest rate
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		  <input type="checkbox"/> Check if Loan  _____% Provide interest rate

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 PTY – Political Party  
 SCC – Small Contributor Committee

Reason for Amendment: \_\_\_\_\_



**Exhibit A-14**

GALENA WEST (State Bar No. 215783)  
Chief of Enforcement  
JENNA RINEHART (State Bar No. 319515)  
Commission Counsel  
**FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q Street, Suite 3000  
Sacramento, CA 95811  
Telephone: (916) 323-6302

Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

FAIR POLITICAL PRACTICES COMMISSION, )  
Plaintiff, )  
v. )  
ANNA SONG and FRIENDS OF ANNA SONG )  
FOR COUNTY BOARD OF EDUCATION 2020, )  
Defendants. )

Case No. 20CV372958  
COMPLAINT FOR INJUNCTIVE  
RELIEF AND MONETARY  
PENALTIES  
[EXEMPT FROM FILING FEES  
PURSUANT TO GOVERNMENT  
CODE SECTION 6103]  
[VERIFIED ANSWER REQUIRED  
PURSUANT TO CODE OF CIVIL  
PROCEDURE SECTION 446]

Plaintiff, the Fair Political Practices Commission, alleges:

**Public Interest**

1. Plaintiff, the California Fair Political Practices Commission, a state agency (“Plaintiff”), brings this action in the public interest to enforce the provisions of the Political Reform Act of 1974 (the “Act”).<sup>1</sup>

**Jurisdiction and Venue**

2. This court has jurisdiction over this matter. As the causes of action in this matter took place in connection with a campaign for Santa Clara County Board of Education, Trustee of Area 5,

<sup>1</sup> The Political Reform 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 are contained in Sections 18110 through 18997 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.

1 located in the County of Santa Clara, and involving campaign statements required to be filed with the  
2 office of the County of Santa Clara Clerk, the County of Santa Clara Superior Court is the proper venue  
3 for this action.

4 **Parties and Preliminary Facts**

5 3. Plaintiff is a state agency created by the Act and authorized to bring a civil action to  
6 enforce the reporting requirements of the Act, pursuant to Government Code sections 90009, 91004, and  
7 91005.5.

8 4. Defendant Anna Song (“Song”), an individual, has served as Trustee of Area 5 for the  
9 Santa Clara County Board of Education since 2000 and is a candidate on the November 3, 2020 General  
10 Election ballot for re-election.

11 5. Defendant Friends of Anna Song for County Board of Education 2020 (the “Committee”)  
12 is a candidate-controlled campaign committee formed pursuant to the Act as Song’s campaign  
13 committee for re-election to the Santa Clara County Board of Education in the November 3, 2020  
14 General Election. Song serves as the Committee’s treasurer.

15 6. On August 6, 2020, the Friends of Anna Song for County Board of Education 2016 was  
16 redesignated to the Committee for the November 3, 2020 General Election, thereby triggering the  
17 Committee’s filing obligations under the Act.

18 **Campaign Reporting Requirements**

19 7. An express purpose of the Act, as set forth in Government Code section 81002,  
20 subdivision (a), is to ensure that the contributions and expenditures affecting election campaigns are  
21 fully and truthfully disclosed to the public, so that voters may be better informed, and so that improper  
22 practices may be inhibited.

23 8. In furtherance of this purpose of disclosure, the Act sets forth a comprehensive campaign  
24 reporting system. (Gov. Code, § 84200 et seq.)

25 9. A committee controlled directly or indirectly by a candidate, or that acts jointly with a  
26 candidate, is known as a candidate-controlled committee. (Gov. Code, § 82016.) A candidate-controlled  
27 committee must periodically file campaign statements that disclose the committee’s financial  
28 information, including contributions received and expenditures made. (Gov. Code, § 84211.)



1 18. Defendants had a duty to timely file a preelection campaign statement for the reporting  
2 period of September 20, 2020 through October 17, 2020 (the “Second Preelection Statement”).

3 19. Defendants failed to timely file the Second Preelection Statement by the October 22,  
4 2020 deadline.

5 20. To date, Defendants have not filed the Second Preelection Statement.

6 21. By failing to timely file the Second Preelection Statement, Defendants violated  
7 Government Code Sections 84200.5, subdivision (a), and 84200.8, subdivision (b).

8 **Request for Injunctive Relief**

9 22. Unless and until this court compels Defendants to file the preelection campaign  
10 statements referenced above, Defendants’ wrongful conduct will cause great and irreparable harm to the  
11 voters of Santa Clara County by denying them important information to which they are entitled  
12 regarding who contributed to Song’s campaign, and how Defendants spent those contributions.

13 23. Plaintiff has no adequate remedy at law or through administrative action for the injuries  
14 currently being suffered because the information sought must be available to the voters of Santa Clara  
15 County immediately as the pertinent election occurs on November 3, 2020. Any action in law or  
16 administrative action would not be sufficient because it would not compel Defendants to comply with  
17 the law immediately, thereby denying voters the information sought and subverting the intent of the law  
18 requiring timely disclosure of campaign contributions and expenditures.

19 **Prayer for Relief**

20 WHEREFORE, Plaintiff prays judgment against Defendants, and each of them, as follows:

21 1. For monetary penalties pursuant to Government Code section 91004, in an amount  
22 according to proof;

23 2. For monetary penalties pursuant to Government Code section 91005.5, in an amount  
24 according to proof, up to five thousand dollars (\$5,000) per violation;

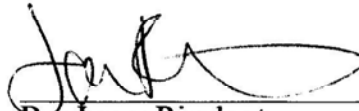
25 3. For a preliminary injunction pursuant to Government Code section 90009 compelling  
26 Defendants to immediately file all campaign statements and reports required under the Political Reform  
27 Act as the result of Song’s 2020 campaign for Santa Clara County Board of Education, Trustee of Area  
28 5;

1           4.       For a permanent injunction pursuant to Government Code section 90009 compelling  
2 Defendants to immediately file all campaign statements and reports required under the Political Reform  
3 Act as the result of Song's 2020 campaign for Santa Clara County Board of Education, Trustee of Area  
4 5; and

5           5.       For such other and further relief as the court deems proper.

6  
7 Date: October 30, 2020

Galena West  
Chief of Enforcement  
Fair Political Practices Commission

9  
10  
11 

12 By: Jenna Rinehart  
13 Commission Counsel  
14 Attorney for Plaintiff  
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**Exhibit A-15**



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

October 31, 2023

**Anna Song**, individually and on behalf of Friends of Anna Song for County Board of Education for 2020

[REDACTED]  
Via Email: [REDACTED]

**NOTICE OF DEFAULT DECISION AND ORDER**

**Re: FPPC No. 20/950; In the Matter Anna Song and Friends of Anna Song for County Board of Education for 2020**

Dear Anna Song and Committee:

On August 16, 2022, 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 November 16, 2023. 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 January 18, 2024 and impose an administrative penalty of \$63,500 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) 237-5910 or [jrinehart@fppc.ca.gov](mailto:jrinehart@fppc.ca.gov) if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

*Jenna Rinehart*

Jenna C. Rinehart,  
Commission Counsel  
Enforcement Division

---

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



**Exhibit A-16**



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

November 28, 2023

**Anna Song**, individually and on behalf of Friends of Anna Song for County Board of Education for 2020



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

**Re: FPPC No. 20/950; In the Matter Anna Song and Friends of Anna Song for County Board of Education for 2020**

Dear Anna Song and Committee:

On August 16, 2022, 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 November 16, 2023. The Commission will be asked to adopt the default at its public meeting scheduled for January 18, 2024 and impose an administrative penalty of \$63,500 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on January 18, 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 or at [CommAsst@fppc.ca.gov](mailto:CommAsst@fppc.ca.gov).

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.

///

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

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 January 18, 2024 meeting. Please contact me at (279) 237-5910 or [jrinehart@fppc.ca.gov](mailto:jrinehart@fppc.ca.gov) if you wish to enter into a negotiated settlement.

Sincerely,

*Jenna Rinehart*

Jenna Rinehart,  
Commission Counsel  
Enforcement Division

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