

Ethics Commission

September 12, 2025

Councilmember Jennifer Campbell
Re-Elect Dr. Jen Campbell for City Council 2022
202 "C" Street, 10th Floor
San Diego, CA 92101

SENT VIA E-MAIL

Re: Re-Elect Dr. Jen Campbell for City Council 2022 (ID # 1436385)

Dear Councilmember Campbell:

The Ethics Commission audit of the above-referenced committee is now concluded, and the Final Audit Report is enclosed. This report was delivered to the Ethics Commission at its regularly-scheduled meeting held on September 11, 2025.

Sincerely,

[REDACTED]

Rosalba Gomez
Audit Program Manager

Enclosure

cc: Nancy Haley, Treasurer
374 N. Coast Highway 101, Suite 2
Encinitas, CA 92024

FINAL AUDIT REPORT

September 11, 2025

Councilmember Jennifer Campbell
Re-Elect Dr. Jen Campbell for City Council 2022
202 “C” Street, 10th Floor
San Diego, CA 92101

Treasurer: Nancy Haley
374 N. Coast Highway 101, Suite 2
Encinitas, CA 92024

SAN DIEGO ETHICS COMMISSION
AUDIT REPORT:
Re-Elect Dr. Jen Campbell for City Council 2022

I. Introduction

This Audit Report contains information pertaining to the audit of the committee, Re-Elect Dr. Jen Campbell for City Council 2022, Identification Number 1436385 (“the Committee”) for the period from February 10, 2021, through November 8, 2023. The Committee was selected for audit by a designee of the City Clerk in a random drawing conducted at a public meeting of the Ethics Commission held on September 14, 2023. The audit was conducted to determine whether the Committee materially complied with the requirements and prohibitions imposed by the City of San Diego’s Election Campaign Control Ordinance (San Diego Municipal Code Chapter 2, Article 7, Division 29). The Election Campaign Control Ordinance (ECCO) has been amended on several occasions; all Municipal Code references in this report relate to the provisions of ECCO that were in effect at the time of the actions described herein.

During the period covered by the audit, the Committee reported total contributions of \$353,039.35 (inclusive of \$2,766.44 in non-monetary contributions) and total expenditures of \$353,866.59. Total cash contributions relative to total expenditures resulted in a \$3,593.68 differential that was reconciled by the Committee’s miscellaneous increase to cash. **The audit revealed two material findings: the committee failed to maintain campaign literature records, in violation of San Diego Municipal Code section 27.2925.**

II. Committee Information

On February 22, 2021, the Committee filed a Statement of Organization with the San Diego City Clerk indicating that it qualified as a committee. The Committee was formed to support the

election of Jennifer H. Campbell for Council District 2 in the June 7, 2022 Municipal Primary Election and the November 8, 2022 Municipal General Election. On November 9, 2023, the Committee filed a Statement of Termination indicating that its filing obligations were completed on November 8, 2023. The Committee's treasurer was Nancy Haley of Haley & Co.

III. Audit Authority

The Commission is mandated by San Diego Municipal Code section 26.0414 to audit campaign statements and other relevant documents to determine whether campaign committees comply with applicable requirements and prohibitions imposed by local law.

IV. Audit Scope and Procedures

This audit was performed in accordance with generally accepted auditing standards. The audit involved a thorough review of the Committee's records for the time period covered by the audit. This review was conducted to determine:

1. Compliance with all disclosure requirements, pertaining to contributions, expenditures, accrued expenditures, and loans, including itemization when required;
2. Compliance with applicable filing deadlines;
3. Compliance with restrictions on contributions, loans and expenditures;
4. Accuracy of total reported receipts, disbursements and cash balances as compared to bank records; and
5. Compliance with all record-keeping requirements.

V. Summary of Applicable Law

Section 27.2925 – Accounting and Recordkeeping

- (a) In addition to any other requirements of this division, every *candidate* or *committee* that accepts *contributions* for a *City election* shall maintain records in accordance with the requirements of title 2, section 18401 of the California Code of Regulations.
- (b) The records required by section 27.2925(a) shall be kept by the *candidate* or *committee treasurer* for a period of four years following the date that the campaign statement to which they relate is filed.
- (c) Every *candidate* or *committee* paying for campaign advertisements supporting or opposing one or more *City candidates* or *City measures* shall maintain records in accordance with the following requirements:
 - (1) for *campaign literature*, records that identify the date(s) of dissemination, the number of pieces disseminated, and the method of dissemination, as well as an original sample of each item of *campaign literature* disseminated by the *candidate* or *committee*, except that an advertising proof or comparable image

of the item in printed or electronic format will comply with this requirement when the size of the item makes maintaining an original sample impracticable;

....

Section 27.2970 – Disclosures on Campaign Advertisements

- (a) Subject to the additional requirements and exceptions expressly noted in section 27.2970, and limited to advertisements concerning *City candidates* and *City measures*, the campaign advertising disclosure rules included in the Political Reform Act of 1974, as amended, including but not limited to California Government Code sections 84305 through 84511, and the regulations of the California Fair Political Practices Commission, as amended, including but not limited to Regulations 18440 through 18450.11, are adopted by reference and incorporated into the San Diego Municipal Election Campaign Control Ordinance as if fully set forth herein.
- (b) When a *candidate* or *candidate-controlled committee* established for *elective City office* is not required to make a “paid for by” advertising disclosure under state law, the *candidate* or *committee* shall make such a disclosure as if the advertisement is an *independent expenditure*.

....

VI. Material Findings

Section 27.2925: Failure to Maintain Advertising Records

Section 27.2970(b) requires candidate committees that pay for campaign literature advertisements to include the words “paid for by” immediately followed by the name of the committee. In addition, Section 27.2925(c)(1) requires that committees maintain an original copy or comparable proof/image for each disseminated campaign literature advertisement.

The audit review found that the Committee paid for and disseminated two mailers which did not have an ad “paid for by” disclosure. The two mailers are described as Dr. Jen3 and Dr. Jen7. The following table details the Committee mailer information:

Vendor	Mail House Sub-Vendor	Description
Amplify Campaigns, LLC	Richmond Blueprint & Litho	10,225 mailers - DrJen3 8.5x11 non-Dem
Amplify Campaigns, LLC	Mailing Pros, Inc.	9,249 mailers - DrJen7 9x12 non-Dem

According to the information and documentation provided by Committee representatives to the Ethics Commission, the two mailer documents were not the final disseminated versions. The Committee representatives clarified that the mail house sub-vendors were instructed to place the disclosures in each mailer. A contemporaneous Committee email to a mail house sub-vendor

conveying the disclosure content and placement instructions, was submitted to corroborate that the DrJen3 mailer complied with the disclosure requirement.

In addition, the Committee representatives provided a copy of what appears to be an address section of a mailer that also included a “paid for by” disclosure to support that the DrJen7 mailer complied with the disclosure requirements. The audit review found that the address submission with a disclosure was a cutout and did not consist of a complete mailer, which makes it impossible to determine if the DrJen7 mailer content matched with the submitted document. Therefore, it could not be used to verify that the DrJen7 mailer complied with the requisite disclosure.

The Committee acknowledged that it was unable to provide finalized complete originals and/or copies of the two published mailers. Because the Committee failed to retain complete mailer records, the Auditor was unable to verify if they complied with the “paid for by” disclosure requirement.

At the post-audit conference held on August 12, 2024, the Committee representatives conceded that they were unable to provide the final mailer proofs but asserted that the omission was unintentional and that its overall actions evidence its intent to substantially comply with applicable regulations.

VII. Conclusion

Through the examination of the Committee’s records and campaign disclosure statements, the Auditor verified that the Committee timely disclosed all contributions received and all expenditures made, and that the Committee maintained all necessary documentation regarding contributions and expenditures in accordance with disclosure and record-keeping provisions of ECCO, with the following exceptions: **the committee failed to maintain campaign literature records, in violation of San Diego Municipal Code section 27.2925.**

[REDACTED]

Rosalba Gomez
Audit Program Manager

Date

[REDACTED]

Bryn Kirvin
Executive Director

Date