



## FAIR POLITICAL PRACTICES COMMISSION

418 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax: (916) 322-0880

February 22, 2013

Mr. Donald Turner  
Seeley Union School District

**REDACTED**

Re: Warning Letter  
FPPC No. 12/807: Donald Turner; Seeley Union School District Board Member

Dear Mr. Turner:

The Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act ("Act"),<sup>1</sup> found in Government Code Section 81000, and following. This letter is in response to an allegation that alleged you violated the Act's disclosure provisions regarding your failure to disclose rental property on your Statement(s) of Economic Interests ("SEI").

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you violated the Act's disclosure provisions when you failed to disclose your interests in six rental properties located in your jurisdiction.

Section 87300 of the Act requires every state and local agency to develop a Conflict-of-Interest Code. This code must require persons involved in the making, or participating in the making, of decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose reportable interests. According to your disclosure category, you are required to disclose interests in real property which is located in whole or in part either (1) within the boundaries of the District, or (2) within two miles of the boundaries of the District, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property. Under Section 87206, an interest in real property is reportable if you, your spouse or registered domestic partner, or your dependent children had a direct, indirect, or beneficial interest totaling \$2,000 or more any time during the reporting period.<sup>2</sup>

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<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.

<sup>2</sup> Excluding any property used as your personal residence.

Your actions violated the Act because you failed to disclose your interests in real property on your SEIs. However, since you filed amendments to disclose these interests, and you do not have a history of violating the Act, we are closing this matter with a warning letter. The information in this matter will be retained and may be considered should an enforcement action become necessary based on future conduct or newly discovered information. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an FPPC case resolution without administrative prosecution or fine. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Fair Political Practices Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the FPPC's website ten (10) days from the date of this letter.

The FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at 1-866-275-3772. Please also visit our website at [www.fppc.ca.gov](http://www.fppc.ca.gov).

Please feel free to contact Terri Rindahl at (916) 327-2018 with any questions you may have regarding this letter.

Sincerely,

**REDACTED**

Gary S. Winuk  
Chief, Enforcement Division

GSW/tr