



FAIR POLITICAL PRACTICES COMMISSION

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

(916) 322-5660 • Fax (916) 322-0886

April 7, 2015

Mr. Ryan Sherman
Sherman; Ryan

[REDACTED]
[REDACTED]

Warning Letter: Case No. 14/1088, Ryan Sherman

Dear Mr. Sherman:

The Fair Political Practices Commission (FPPC) enforces the provisions of the Political Reform Act (the "Act") contained in Government Code sections 81000 through 91014. This letter is in response to a non-filer enforcement referral from the California Secretary of State (SOS) which alleged the Act's lobbyist reporting provisions were violated when a "Lobbyist Report" (Form 615) was not filed for Ryan Sherman.

The FPPC has completed its investigation and found that Ryan Sherman, as a California lobbying firm, failed to timely file a "Report of Lobbying Firm" (Form 625) with SOS for the following quarter:

- January 1, 2014 through March 31, 2014 (Due April 30, 2014).

The FPPC also found that Ryan Sherman, as a California lobbyist, failed to *timely* file a "Lobbyist Report" (Form 615) with the SOS for the following quarters:

- January 1, 2014 through March 31, 2014 (Due April 30, 2014).
- April 1, 2014 through June 30, 2014 (Due July 31, 2014)
- July 1, 2014 through September 30, 2014 (Due October 31, 2014)

Under section 86114, lobbying firms are required to file periodic reports disclosing payments made and received in connection with lobbying activities. This requirement is satisfied by filing the Form 625. The firm must attach to the Form 625 a Form 615 completed by each partner, owner, officer, or employee of the firm who qualifies as a lobbyist.

Your actions violated the Act because you failed to timely file a *complete* Form 625 for the aforementioned quarters by not attaching a Form 615 for your lobbyists. However, since Mr. Sherman is new to the lobbying field, all missing forms have since been filed, and you do not have a history of violating the Act, we are closing your case with this warning letter.

Although the Enforcement Division is closing this case without seeking a penalty, please note that any future non-filings will be brought to our attention and may result in monetary penalties. This warning letter may be considered should a future FPPC enforcement action become necessary.

A warning letter is an FPPC case resolution without administrative prosecution; however, this resolution does not provide you with the opportunity for a probable cause or administrative hearing. 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 days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of your case. If we do not receive such notification, this warning letter will be posted on the FPPC's website.

Should you have any questions regarding this letter, contact Chris LaGrassa at (916) 322-7050.

Sincerely,

A black rectangular redaction box covering the signature of Galena West.

Galena West
Chief, Enforcement Division

cc: Mr. Chris Reynolds, Chief
California Secretary of State
Political Reform Division

GW:tf:cl