



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

August 13, 2024

Nicholas Sanders
o/b/o Sean Loloee
Sanders Political Law
1121 L Street, Suite 105
Sacramento, CA 95814

Via email: nicholas@sanderspoliticallaw.com

Warning Letter re: FPPC Case No. 2023-00792; Sean Loloee

Dear Mr. Sanders:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a Commission-initiated investigation. The Enforcement Division has completed its review of the matter and found that Sean Loloee (“Loloee”) failed to timely report various economic interests on their 2022 Annual Statement of Economic Interests (“SEI”).

The Act requires that members of city councils file a SEI by April 1st each year, disclosing investments, interests in real property, and income during the reporting period.² Loloee violated the Act by failing to timely disclose one piece of real property, four investment interests in individual stocks, and 15 sources of rental income (related to one timely-disclosed piece of real property) on their 2022 Annual SEI. However, Loloee cooperated with the Enforcement Division and filed an amendment to the subject SEI reporting the missing information, is no longer in office, and has no prior history of the same violation. Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which requires the Enforcement Division to take all appropriate actions within their discretion to decrease the Division’s annual carryover caseload, the Enforcement Division is closing this case with this warning letter.³ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁴ This resolution may not be used as a comparable case for other enforcement matters.⁵

¹ 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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Sections 87200 and 87203, and Regulation 18723, subd. (b)(2).

³ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁴ Regulations 18360.1 and 18360.3.

⁵ See Regulation 18361.5, subd. (e)(3).

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. 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 Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulations 18360.1 and 18360.2 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. 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 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 Enforcement Division 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 Commission's website ten (10) days from the date of this letter.

Please feel free to contact me at cburton@fppc.ca.gov or (279) 237-3769 with any questions you may have regarding this letter.

Sincerely,

Christopher B. Burton

Christopher B. Burton
Assistant Chief of Enforcement
Fair Political Practices Commission