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

July 16, 2025

Amber Maltbie
Nossaman LLP
o/b/o John Lee
Via email: amaltbie@nossaman.com

Warning Letter Re: FPPC No. 2025-00494; John Lee

Dear Amber Maltbie:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").[1] As you are aware, the Enforcement Division received an anonymous complaint alleging that your client failed to timely file a behested payment report (Form 803).

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that Foxcorp Holdings, LLC made a $10,000 payment, at your client's behest, on November 6, 2024 to the North Valley YMCA. This payment triggered behested payment reporting obligations under the Act. Once a source reaches the $5,000 disclosure threshold in a calendar year, all payments from that source, regardless of the amount, must be disclosed.

The Act provides that payments that are made principally for a legislative, governmental, or charitable purpose are neither contributions nor gifts to the elected official.[2] However, the payments made at the behest of an elected official must be reported by the official within 30 days following the date on which the payment or payments are made, if they equal or exceed $5,000 in the aggregate, and are from the same source in the same calendar year.[3]

Your client's actions violated the Act because they failed to timely file a behested payment report (Form 803) within 30 days of the date of the payment for the above-mentioned payment. However, mitigating factors exist such that the Enforcement Division has decided to close this

[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 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.
[2] Sections 82004.5 and 82015(c)(4).
[3] Section 84224.

case with this warning letter rather than issue a fine: the payment amount was less than $30,000; your client was cooperative when contacted by the Enforcement Division; your client promptly filed the outstanding Form 803 when compliance was requested; the violation resulted in minimal public harm; and your client has no prior history of violating this section of the Act.

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 Regulation 18360.1 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 Franceska Gonzalez at fgonzalez@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Franceska Gonzalez

Franceska Gonzalez, Attorney
Enforcement Division