



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

May 12, 2025

Danny Tillman

Via email: [REDACTED]

Warning Letter re: FPPC No. 2024-00303, In the Matter of Danny Tillman

Dear Danny Tillman,

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ As you are aware, the Enforcement Division received a non-sworn complaint against you, alleging that in your capacity as a member of the Board of Education for the San Bernardino Unified School District (“District”), you had a prohibited conflict of interest in certain governmental decisions. The Enforcement Division has completed its investigation and review of the matter and will close the matter with this letter.

No public official at any level of state or local government may make, participate in making, or in any way attempt to use their official position to influence a governmental decision in which they know or have reason to know she has a financial interest.² A public official has a financial interest in a decision if it is reasonably foreseeable that the decision will have a material financial effect, distinguishable from its effect on the public generally, on the official, a member of the official’s immediate family, or on the official’s financial interests.³ A financial interest can include any source of income aggregating \$500 dollars or more received by the public official within 12 months before the decision is made.⁴

On August 4, 2020, June 23, 2021, and October 19, 2021, you voted on contracts related to or with the Center for Youth and Community Development (“CYCD”). In 2018, your spouse, Tracy Tillman, began employment with CYCD. Therefore, you had an economic interest in CYCD as you had a community property interest in your spouse’s source of income. In 2018 and 2019, you recused yourself from voting on matters related to CYCD. However, the evidence shows that your spouse left employment with CYCD and started a position with another employer on or around June 20, 2019. Our investigation determined that you did vote on decisions related to CYCD, but these decisions occurred when CYCD was no longer a source of income to you because more than a year had passed since your spouse left employment with CYCD. Based on these findings, the Enforcement Division finds that the complaint alleging a conflict of interest with respect to the decisions made on August 4, 2020, June 23, 2021, and October 19, 2021, is disproved.

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 Section 87100.

³ Section 87103.

⁴ Section 87103, subdivision (c).

The Act requires every state and local agency to develop a conflict of interest code.⁵ These codes must designate those officials who participate in making decisions that may foreseeably have a material financial effect on any financial interest belonging to that official and require those designated officials to disclose all reportable interests on Statements of Economic Interests (“SEIs”).⁶ The requirements of an agency’s Conflict of Interest Code have the force of law, and any violations of those requirements are deemed a violation of the Act.⁷ According to the Conflict of Interest Code adopted by the District, a Board Member was required to disclose, amongst other interests, income from sources that are contractors or subcontractors engaged in work or services of the type used by the department. Board Members are required to file SEIs to disclose their financial interests regularly.

You were required to disclose your spouse’s income from CYCD on your 2019 Annual SEI. You filed the statement timely but failed to disclose this financial interest. Prior to contact from the Enforcement Division, you amended to disclose this interest.

This violation is eligible for a Tier 2 Penalty under the FPPC’s Streamline Settlement Program, as the late-reported interest had business before and appeared before the Board, and you did not have a conflict of interest violation because you properly recused yourself as described above.⁸ However, the Assistant Chief Counsel has authorized the use of Chief Discretion to resolve this violation with this warning letter because there is mitigation in this matter. You recused yourself from decisions regarding CYCD and disclosed the source of income at the time of recusal. This disclosure was made at the public meetings and was disclosed in advance of the due date of the 2019 Annual SEI. Additionally, you amended the SEI prior to the complaint being filed or being contacted by the Enforcement Division to include your interest in CYCD. Finally, you stated that you did not have training regarding filing SEIs.

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.

⁵ Section 87300.

⁶ Section 87302, subdivision (a).

⁷ Section 87300.

⁸ Regulation 18360.2, subdivision (e)(2)(D).

If you have any questions regarding this letter, please contact Theresa Gilbertson at tgilbertson@fppc.ca.gov or by phone at (279) 237-5960.

Sincerely,

Theresa Gilbertson

Theresa Gilbertson
Senior Commission Counsel
Enforcement Division

CC: Filing Officer, Santa Clara County