



June 19, 2025

Susan Burns Cochran
via email: [REDACTED]

Warning Letter: FPPC No. 2025-00584, Susan Burns Cochran

Dear Susan Burns Cochran:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a sworn complaint we received regarding your failure to disclose certain economic interests on your Statements of Economic Interests (SEIs). The Enforcement Division found that as a result of your position as a Consultant for the City of Petaluma, the Act requires you to periodically file a SEI and that you failed to timely disclose certain economic interests on your Assuming Office and 2024 Annual SEIs.

Section 87300 of the Act requires every state and local agency to develop a Conflict of Interest Code. This Code requires individuals who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose all reportable interests on SEIs.² Individuals required to file SEIs, must file within 30 days of assuming office, annually thereafter at the time specified by the Code, and within 30 days of leaving office.³

You violated the Act by failing to disclose certain economic interests on your Assuming Office and 2024 Annual SEIs by the applicable deadlines. But, the Enforcement Division has decided to close your case with this warning letter rather than a fine because you have since filed a corrective amendment to the 2024 Annual SEI to disclose your law firm as an investment and source of income, and you have no prior Enforcement history.

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. Although the Enforcement Division is closing this case without seeking a penalty, you are still required to file an amendment to your Assuming Office SEI to disclose your law firm as an investment and source of income.

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

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 87302, subd. (b).

³ *Ibid.*

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.

If you have any questions regarding this letter, please contact Cole Smith at csmith@fppc.ca.gov.

Sincerely,

Christopher B. Burton

Christopher B. Burton
Assistant Chief, Enforcement Division

CBB:cts