



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

July 9, 2026

Sierra Expeditionary Learning School
Attn: David Manahan
Via Email: [REDACTED]

Advisory Letter re FPPC No. 2026-00515; Sierra Expeditionary Learning School

Dear Sierra Expeditionary Learning School:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to an anonymous complaint received regarding the Sierra Expeditionary Learning School’s (the “charter school”) failure to adopt a conflict of interest code. The Enforcement Division completed its investigation and has decided to close its file on this matter without prosecution.

The Act requires every agency to adopt and promulgate a Conflict of Interest Code.² The Commission has previously issued advice where it was concluded that all charter schools organized pursuant to Education Code section 47600 et seq. meet the criteria used to determine if an organization is a local governmental agency.³

Here, the charter school had no conflict of interest code and was unaware of the requirements until this complaint. After becoming aware of the requirements, the charter school adopted a conflict of interest code on January 5, 2026. Due to the charter school’s cooperation, minimal public harm, and the fact that compliance has been achieved, we are closing this matter with this advisory letter.

Although we are closing our file, please be advised of the provisions of the Act and regulations regarding the conflict of interest code rules. Should you have any questions regarding this letter, please contact me at (279) 237-5913 or at jrivera@fppc.ca.gov.

Sincerely,

Jonathan Rivera

Jonathan Rivera
Commission Counsel, Enforcement Division

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.

² Section 87300.

³ FPPC Advice Letter [A-98-234](#).