



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329

April 24, 2017

Steven Dicterow
c/o Laurence Nokes
Nokes & Quinn
lnokes@nokesquinn.com

Re: Warning Letter – In the Matter of Steven Dicterow, FPPC No. 16/19821

Mr. Dicterow:

The Enforcement Division of the Fair Political Practices Commission received two complaints alleging you failed to disclose economic interests on annual Statements of Economic Interests (SEI) you filed for your position on the Laguna Beach City Council between 2012 and 2015. The interests in question are a condominium you own located at 3117 Via Serena South, Unit A, Laguna Woods, California (the “Condo”) and your position as General Counsel for American Computer Optics, Inc.

The Political Reform Act (the “Act”)¹ requires city council members to disclose on SEIs certain economic interests, including real property located within two miles of an official’s jurisdiction and business positions in companies that own real property in, or do business in, the jurisdiction.²

The Enforcement Division determined the Condo, although not located in Laguna Beach, was within 2 miles of the Laguna Beach city limit. That being the case, it should have been reported on your SEIs for each year you owned it. You have since filed amended SEIs disclosing the Condo as an economic interest. With regard to your business position with American Computer Optics, Inc. the Enforcement Division did not find evidence showing American Computer Optics, Inc. owned real property in, or did business in, Laguna Beach so there is no indication you were not required to report that interest on your SEIs.

Your failure to initially disclose your interest in the Condo, although a violation of the Act, appears to have been inadvertent. There is no indication you made or participated in any decisions in your official position that would have impacted the value of the Condo. Upon learning of the violations, you filed amended SEIs disclosing your interest in the Condo. Further, you have no history of prior violations of the Act. For these reasons, we are closing this case with this warning letter.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of Title 2 of the California Code of Regulations.

² Government Code sections 82035, 87200, 87206, and 87209.

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 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 questions regarding this matter, please contact me at dbainbridge@fppc.ca.gov.

Sincerely,

Dave Bainbridge

Dave Bainbridge
Assistant Chief
Enforcement Division