

1 ROB BONTA
Attorney General of California
2 CAITLIN W. NOBLE
Supervising Deputy Attorney General
3 KIM KASRELIOVICH
Deputy Attorney General
4 State Bar No. 261766
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013-1230
Telephone: (213) 269-6473
6 Fax: (916) 731-3637
E-mail: Kim.Kasreliovich@doj.ca.gov
7 *Attorneys for the Registrar,
Registry of Charities and Fundraisers*

8
9 **BEFORE THE**
10 **ATTORNEY GENERAL**
11 **STATE OF CALIFORNIA**
12

13 In the Matter of the Order to Cease and Desist
14 Against:

Case No. 2025 - FP0003456

15 **FLIPCAUSE AND SEAN WHEELER,**
16

ORDER TO CEASE AND DESIST

17 Respondents.
18

19 FLIPCAUSE, INC., (“Flipcause”) is ordered to immediately CEASE AND DESIST from
20 solicitations for charitable purposes in California, pursuant to Government Code section 12591.1,
21 subdivision (b). This order applies to Flipcause, its owners, officers, directors, employees, and all
22 persons or entities acting on its behalf, including Sean Wheeler (collectively, “Respondents”).

23 Based on the violations set forth below, this order and the penalties assessed will become
24 final unless a written appeal is received within 30 calendar days of the date of this notice.

25 **FINDINGS**

26 The Attorney General makes the following findings:
27
28

1 1. The Attorney General is responsible for protecting charitable assets in California and
2 enforcing the provisions of the Supervision of Trustees and Fundraisers for Charitable Purposes
3 Act (“the Charitable Supervision Act”) pursuant to Government Code section 12580, et seq.

4 **Failure to Register with the Attorney General’s Registry of Charities and Fundraisers**

5 2. Persons and entities in California holding charitable assets are required to register and file
6 annual reports with the Attorney General’s Registry of Charities and Fundraisers (“the Registry”).
7 A charity, or any person or entity soliciting on behalf of a charity, has a fiduciary relationship
8 with any person from whom a charitable contribution is being solicited. (Bus. & Prof. Code, §
9 17510.8.) The acceptance of a charitable contribution by a charity, or any person soliciting on
10 behalf of a charity, establishes a charitable trust and a duty to use the charitable contribution for
11 the declared charitable purposes for which it was sought. (*Id.*)

12 3. Any person, corporation, unincorporated association, or other legal entity that uses the
13 internet to provide an internet website, service, or other platform and performs, permits, or
14 enables acts of solicitation to occur constitutes a charitable fundraising platform (“fundraising
15 platform”). (Gov. Code, § 12599.9, subd. (a).) A fundraising platform must be registered prior to
16 soliciting, permitting, or otherwise enabling acts of solicitation. (Gov. Code, § 12599.9, subd. (b);
17 Cal. Code Regs., tit. 11, § 315, subd. (a).) A registration is only valid for one year and must be
18 renewed each year. (Gov. Code, § 12599.9, subd. (b)(2); Cal. Code Regs., tit. 11, § 315, subd.
19 (b).) A fundraising platform must file annual fundraising reports (Form PL-4) by July 15 of each
20 year, accounting for all funds collected and distributed during the prior year. (Gov. Code, §
21 12599.9, subd. (c); Cal. Code Regs., tit. 11, § 315, subd. (e).) The purpose of the annual
22 fundraising reports is to “[e]nable the Attorney General to ascertain whether charitable funds have
23 been properly solicited, received, held, controlled, or distributed in compliance [with the law]”
24 and ensure the charitable purpose of the donations is realized. (Gov. Code, § 12599.9, subd.

1 (c)(1).) It is unlawful for a fundraising platform to solicit, permit, or enable acts of solicitation for
2 charitable purposes unless it has complied with the registration or annual renewal and financial
3 reporting requirements of the Charitable Supervision Act. (Gov. Code, § 12580 et seq.; §
4 12599.9, subds. (b) and (c); Cal. Code Regs., tit. 11, § 315.) A person or entity must be registered
5 and in good standing with the Registry to operate or solicit for charitable purposes. (Cal. Code
6 Regs., tit. 11, § 312.)

8 4. Respondents solicit, permit, or enable acts of solicitation by operating an online
9 platform that hosts websites for non-profit organizations, supports donor database management,
10 and accepts and processes online donations on behalf of their client nonprofit organizations.
11 Flipcause advertises as “The best fundraising platform for small nonprofits.”¹ The services
12 offered by Flipcause include: Donations and Payments, Events and Registration, Text-To-Give,
13 Peer-to-Peer Fundraising, Crowdfunding, Volunteers, Online Store and Sponsorships.²
14 Specifically, Flipcause offers:

16 **Better Donations and Payments Processing for Small
Nonprofits**

17 Simple donation buttons, complex payment forms, or custom-
18 branded donation campaign landing pages – any payment you need
to take, you can set it up on Flipcause.

19 At Flipcause, your money and your data always belong to you.

20 **Seamless donations on your website**

21 Every website needs built-in donations that are easy to use. Add a
22 custom button that pops up to a donation widget, or embed your
donation form directly on your page.

23 **Custom and preset donation levels**

24 Choose the giving presets that work best for your particular ask,
25 and explain the impact created by each giving level. You can allow
donors to enter their own amount, or only offer the preset levels to
choose from.

26 **Recurring donations and sustainable giving**

27 ¹ <https://www.flipcause.com/>

28 ² <https://www.flipcause.com/>

1 Easily set up sustaining giving campaigns and manage your
2 subscribers from your recurring payments dashboard. Our system
3 automatically follows up with failed payments, and allows donors
to update their own contribution settings.³

4 5. On August 17, 2012, Flipcause incorporated with the Delaware Secretary of State. A true
5 and correct copy of the Delaware Department of State online verification is attached hereto as
6 Exhibit A.

7 6. On February 18, 2014, co-founder and board member of Flipcause, Emmerson Valiao,
8 filed a Statement and Designation by Foreign Corporation with the California Secretary of State.
9 The Corporate Address was listed as 550A London Street, San Francisco, CA 94112. A true and
10 copy of the Statement and Designation by a Foreign Corporation is attached hereto as Exhibit B.

11 7. On October 21, 2019, the Registry issued a notice to Flipcause titled: **NOTICE TO**
12 **REGISTER AS A PROFESSIONAL FUNDRAISER FOR CHARITABLE PURPOSES.**⁴

13 8. On April 15, 2025, Flipcause filed a Statement of Information with the California
14 Secretary of State, declaring that Sean Wheeler as the Chief Executive Officer, Chief Financial
15 Officer, and Secretary of the organization. The principal address of Flipcause is 101 Broadway
16 Street, Oakland, CA 946071. A true and correct copy of the Statement of Information is attached
17 hereto as Exhibit C.

18 9. To date, Flipcause has not registered with the Registry of Charities and Fundraisers or
19 provided any reports.

20 **Failure to Remit Donations**

21 10. Fundraising platforms which utilize a website or software program that allows
22 charitable organizations to solicit and receive donations on or through the platform, must remit
23 the donations to the charitable organizations within five business days of receipt. (Gov. Code, §
24 12599.9, subds. (a)(1)(E) and (h).; Cal. Code Regs., tit. 11, § 320, subd. (c)(1).)

25
26 ³ <https://flipcause.org/donations/>

27 ⁴ Effective January 1, 2023, section 12599.9 was added to the Government Code, creating
28 charitable fundraising platforms, a new category of entity subject to the jurisdiction of the
Attorney General. Flipcause is now considered a charitable fundraising platform and not a
professional fundraiser for charitable purposes.

11. Charitable fundraising platforms are required to hold the funds received through solicitation on the platform in a separate account and promptly ensure that those donations are sent to the recipient charitable organization with an accounting of any fees imposed. (Gov. Code, § 12599.9, subd. (h).)

12. The following charities reported that Flipcause acted as their charitable fundraising platform between 2023 and the present, and took 60 days or more to remit donations: Dorcas Destiny, Tuscarawas County University Foundation, and Peoria Grown.

13. The following charities have reported that Flipcause acted as their charitable fundraising platform between 2023 and the present, and failed to remit the following donations, despite repeated requests over a period of more than 60 days:

1.	GOALS Athletic League	\$47,502.00
2.	East Oakland Collective	\$76,381.86
3.	Pasadena Roving Archers Heritage	\$22,945.71
4.	Black Visioning Group	\$69,379.52
5.	CityLax, Inc.	\$126,809.95
6.	21st Century Dads	\$33,163.33
7.	Intersection for the Arts	\$144,746.14
8.	Arizona Academy of the Performing Arts	\$26,000.00
9.	Provision Packs	\$7,000.00
10.	Designer Genes	\$2,433.00
11.	Camp Impact	\$17,826.03
12.	Mercer Island Fine Arts Advisory Comm	\$35,632.10
13.	Critter Adoption & Rescue Effort	\$4,617.93
14.	Harmony New Beginnings Animal Rescue	\$805.00

VIOLATIONS IN SUPPORT OF CEASE AND DESIST ORDER

Based on the findings above:

1. Grounds for the issuance of a cease and desist order exist pursuant to California Government Code section 12591.1, subdivision (b), and California Code of Regulations, title 11, section 337, subdivision (a)(5), and section 315, subdivision (a), because Flipcause solicited, permitted, and/or enabled acts of solicitation by operating an online platform that hosts a website for charitable organizations and then accepts and processes online donations on their behalf in California without being registered, for the reasons stated in Paragraphs 1 through 13, above.

2. Grounds for the issuance of a cease and desist order exist pursuant to California Government Code section 12591.1, subdivision (b)(3), and California Code of Regulations, title 11, section 337, subdivision (a)(3), and section 315, subdivision (c), for failure to file financial reports for the reasons stated in Paragraphs 1 through 13, above.

3. Grounds for the issuance of a cease and desist order exist pursuant to California Government Code section 12591.1, subdivision (b), and California Code of Regulations, title 11, section 320, subdivision (c)(1), for failure to timely send donations processed on the platform to the recipient charitable organizations for the reasons stated in Paragraphs 1 through 13, above.

ASSESSMENT OF PENALTIES

1. Pursuant to Government Code section 12591.1, subdivision (c), the Attorney General may assess a penalty of up to \$1,000 for each act or omission that constitutes a violation under Government Code section 12591.1, subdivision (c), and California Code of Regulations, title 11, sections 336, subdivision (a)(3), and 338. The assessment of penalties is in addition to all other remedies available to the Attorney General, and the Attorney General reserves the right to assert all other remedies. The below-listed penalties are based on the information available to the Attorney General at this time, and the Attorney General also reserves the right to assess additional penalties based on any new information it receives.

2. The Attorney General assesses the following penalties against Respondent:

	VIOLATION	AMOUNT
a.	Failing to comply with the registration requirements of the Charitable Supervision Act by failing to register as a charitable fundraising platform from 2023 ⁵ to the present, in violation of Government Code section 12599.9, subdivisions (b).	\$2,000.00 (\$1,000 x 2 years)
b.	Acting as a charitable fundraising platform without being registered and permitting, soliciting, or otherwise enabling acts of solicitation in violation of Government Code section 12599.9, subdivision (b), and California Code of Regulations, title 11, sections 337 (a)(5), and 315, subdivision (a).	\$17,000.00 (\$1,000 x 17 organizations)
c.	Failing to file annual fundraising reports (Form PL-4) by January 15 of each year, accounting for all funds collected and distributed during the prior year for each organization for which Flipcause, Inc., permitted, solicited, or otherwise enabled acts of solicitation in violation of Government Code section 12599.9, subdivision (c) and California Code Regulations, title 11, section 315, subdivision (e).	\$34,000.00 (\$1,000 x 17 organizations for 2 years)
d.	Failing to remit donations to the charitable organizations for which Flipcause, Inc., permitted, solicited, or otherwise enabled acts of solicitation within five business days of receipt in violation of Government Code section 12599.9, subdivision (h) and California Code Regulations, title 11, section 320, subdivision (c)(1).	\$17,000.00 (\$1,000 x 17 organizations)
	TOTAL PENALTY:	\$70,000.00

4. The penalties listed above will become effective 30 days after the service of this notice. Payment of the penalties is due within 30 days unless a timely written appeal of the assessment of penalty is received by the Attorney General. Payment shall be made payable to the California Department of Justice.

5. Penalties will continue to accrue at the rate of \$100 per day until the Attorney General receives written confirmation that Respondents have ceased all operations and fully complied with the order above.

ORDER

1. FLIPCAUSE, INC., shall CEASE AND DESIST from all operations related to

⁵ The year the charitable fundraising platform law took effect.

1 solicitations for charitable purposes in California. This order applies to FLIPCAUSE, INC., its
2 officers, directors, employees and all persons or entities acting on its behalf, including Sean
3 Wheeler.

4 2. Within 10 days from the date of this order, FLIPCAUSE, INC., will provide a copy of
5 this order to:

- 6 a. Every owner, officer, director and employee of FLIPCAUSE, INC.;
- 7 b. Every governmental entity with which FLIPCAUSE, INC., is required to
8 register or report to conduct charitable solicitations;
- 9 c. Every charity with which FLIPCAUSE, INC., is currently doing business.

10 3. Within 30 days from the date of this order, FLIPCAUSE, INC., shall:

- 11 a. Provide written confirmation that it is in compliance with this order, including
12 proof of service of the order as required by Item No. 2.
- 13 b. Provide a copy of every adverse action against it by a governmental entity. This
14 includes every notice of action, regardless of the outcome and all documents
15 reflecting the resolution of the action.

16 “An adverse action by a governmental entity includes, but is not
17 limited to, suspension, revocation or denial of registration, civil or
18 criminal judgment, assessment of a fine, administrative or civil
19 penalty, entry of assurance of voluntary compliance or enforceable
20 settlement agreement or an equivalent action regardless of its title.”
(Cal. Code Regs., tit. 11, § 339, subd. (g)(1).)

- 21 c. Provide an accounting of all charitable assets within its possession, custody or
22 control from 2015 through the date of its response.
- 23 d. Provide to the Attorney General a list of all charitable organizations, since
24 2015, with which FLIPCAUSE, INC., was involved, or provided a platform to
25 solicit or receive donations. For each organization, provide:
 - 26 i. The name of the charity;
 - 27 ii. The charity’s registration number with the Registry of Charities and
28 Fundraisers. If you do not know the number, provide the Federal
Employer Identification Number;

- iii. The starting and ending dates during which service was provided;
 - iv. The total amount of funds raised;
 - v. The total amount of funds remitted to each organization,
 - vi. The total amount of any funds still held by FLIPCAUSE, INC., on behalf of each organization; and,
 - vii. The total amount paid to FLIPCAUSE, INC. (regardless of whether that amount was for fees, expenses or reimbursements).
- Transfer all of its cash or cash equivalent assets into a blocked bank account unless it obtains prior written authorization from the Attorney General for an alternative disposition. FLIPCAUSE, INC., shall immediately provide to the Attorney General the name and address of the bank, the name and account number of the blocked account along with copies of all documents related to the account;

4. The Attorney General shall retain jurisdiction over FLIPCAUSE, INC., its officers, directors, and key employees to ensure compliance with this order and the provisions of the Supervision of Trustees and Fundraisers for Charitable Purposes Act.

5. Failure to comply with the terms of this order constitutes disobedience or resistance to a lawful order pursuant to Government Code section 11455.10. The Attorney General may pursue a contempt sanction of violations pursuant to Government Code section 11455.20, in addition to any other remedies available to the Attorney General.

NOTICE OF RIGHT TO APPEAL

You have the opportunity to appeal this decision by filing a written appeal and request for hearing within 30 calendar days of the date of this notice. To appeal the decision and request a hearing, you must provide the information requested below and return the written request within 30 days of this notice, to the following address:

Kim Kasrelivovich, Deputy Attorney General
California Department of Justice
Office of the Attorney General
300 South Spring Street, Suite 1702

1 Los Angeles, CA 90013
2 (213) 269-6473
3 Kim.Kasreliovich@doj.ca.gov

4 The appeal procedures are found in California Code of Regulations, title 11, sections 336
5 through 343 and are available on the Attorney General's website at:
6 <https://oag.ca.gov/charities/laws>.

7 If you appeal the decision and request a hearing, you will receive written notice of the
8 scheduled hearing date.

9
10
11 Dated: November 12, 2025

Respectfully submitted,

12 ROB BONTA
13 Attorney General of California
14 CAITLIN W. NOBLE
15 Supervising Deputy Attorney General

16 

17 KIM KASRELIOVICH
18 Deputy Attorney General
19 *Attorneys for the Registry of Charities and*
20 *Fundraisers*

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22
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68004259.docx

EXHIBIT A



Department of State: Division of Corporations

[Allowable Characters](#)[HOME](#)

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	5200420	Incorporation Date / Formation Date:	8/17/2012 (mm/dd/yyyy)
Entity Name:	FLIPCAUSE, INC.		
Entity Kind:	Corporation	Entity Type:	General
Residency:	Domestic	State:	DELAWARE

[REGISTERED AGENT INFORMATION](#)

Name:	THE CORPORATION TRUST COMPANY		
Address:	CORPORATION TRUST CENTER 1209 ORANGE ST		
City:	WILMINGTON	County:	New Castle
State:	DE	Postal Code:	19801
Phone:	302-658-7581		

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like ☐ Status ☐ Status, Tax & History Information

For help on a particular field click on the Field Tag to take you to the help area.

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EXHIBIT B

S&DC-S/N

Statement and Designation by
Foreign Corporation

To qualify a corporation from another state or country to transact intrastate business in California, fill out this form, and submit for filing along with:

- A \$100 filing fee (for a foreign stock corporation) or \$30 filing fee (for a foreign nonprofit corporation), and
- A certificate of good standing, issued within the last six (6) months by the agency where the corporation was formed. **Note:** If the corporation is a nonprofit, the certificate of good standing also must indicate the corporation is a nonprofit or nonstock corporation.
- A separate, non-refundable \$15 service fee also must be included, if you **drop off** the completed form.

Important! Corporations in California may have to pay a minimum \$800 yearly tax to the California Franchise Tax Board. For more information, go to <https://www.ftb.ca.gov>.

FILED
Secretary of State
State of California

1cc FEB 18 2014

This Space For Office Use Only

For questions about this form, go to www.sos.ca.gov/business/be/filing-tips.htm.

Corporate Name (List the exact name of the corporation, as shown in the certificate of good standing. If the name of the corporation is not available for use in the State of California, the corporation must qualify under an assumed name. E.g., "[list the exact name] which will do business in California as [list the proposed assumed name]." For general corporate name requirements and restrictions in California, go to www.sos.ca.gov/business/be/name-availability.htm.)

① Flipcause, Inc.

Corporate History

② State or foreign country where this corporation was formed: State of Delaware

Service of Process (List a California resident or an active 1505 corporation in California that agrees to be your agent to accept service of process in case your corporation is sued. You may list any adult who lives in California. You may **not** list your own corporation as the agent. Do not list an address if the agent is a 1505 corporation as the address for service of process is already on file.)

③ a. Emerson Valiao

Agent's Name

b. 550A London Street San Francisco CA 94112
Agent's Street Address (if agent is **not** a corporation) - Do not list a P.O. Box City (no abbreviations) State Zip

The corporation named in Item 1 above irrevocably consents to service of process directed to it upon the agent designated above, and to service of process on the California Secretary of State if that agent or that agent's successor is no longer authorized to act or cannot be found at the address given.

Corporate Addresses

④ a. 550A London Street San Francisco CA 94112

Street Address of Principal Executive Office - Do not list a P.O. Box City (no abbreviations) State Zip

b. 550A London Street San Francisco CA 94112
Street Address of Principal Office in California, if any - Do not list a P.O. Box City (no abbreviations) State Zip

c.
Mailing Address of Principal Executive Office, if different from 4a or 4b City (no abbreviations) State Zip

Read and sign below: This form must be signed by an officer of the foreign corporation.

► Emerson Valiao
Sign here

Emerson Valiao

Print your name here

CEO

Your business title

Make check/money order payable to: **Secretary of State**

Upon filing, we will return one (1) uncertified copy of your filed document for free, and will certify the copy upon request and payment of a \$5 certification fee.

By Mail

Secretary of State
Business Entities, P.O. Box 944260
Sacramento, CA 94244-2600

Drop-Off

Secretary of State
1500 11th Street, 3rd Floor
Sacramento, CA 95814

Delaware

PAGE 1

The First State

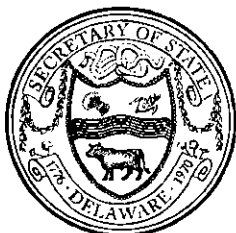
I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "FLIPCAUSE, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FOURTEENTH DAY OF FEBRUARY, A.D. 2014.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

5200420 8300

140182737



You may verify this certificate online
at corp.delaware.gov/authver.shtml

AUTHENTICATION: 1136893

DATE: 02-14-14

EXHIBIT C



BA20250462557

B3492-0566 03/04/2025 11:20 AM Received by California Secretary of State



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
CORPORATION

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only

-FILED-

File No.: BA20250462557

Date Filed: 3/4/2025

Entity Details			
Corporation Name		FLIPCAUSE, INC.	
Entity No.		3647748	
Formed In		DELAWARE	
Street Address of Principal Office of Corporation			
Principal Address		101 BROADWAY STREET OAKLAND, CA 94607	
Mailing Address of Corporation			
Mailing Address		101 BROADWAY STREET OAKLAND, CA 94607	
Attention			
Street Address of California Office of Corporation			
Street Address of California Office		101 BROADWAY STREET OAKLAND, CA 94607	
Officers			
Officer Name	Officer Address	Position(s)	
Sean Wheeler	91-2079 KAI'OLI STREET #1101 EWA BEACH, HI 96706	Chief Executive Officer	
EMERSON RAVYN	101 BROADWAY STREET OAKLAND, CA 94607	Secretary, Chief Financial Officer	
Additional Officers			
Officer Name	Officer Address	Position	Stated Position
None Entered			
Directors			
Director Name	Director Address		
None Entered			
The number of vacancies on Board of Directors is: 0			
Agent for Service of Process			
Agent Name		Shelby L Jones	
Agent Address		101 BROADWAY OAKLAND, CA 94607	
Type of Business			
Type of Business		COMPUTER SOFTWARE SERVICE	
Email Notifications			
Opt-in Email Notifications		Yes, I opt-in to receive entity notifications via email.	
Labor Judgment			
No Officer or Director of this Corporation has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.			

Electronic Signature

☒ By signing, I affirm that the information herein is true and correct and that I am authorized by California law to sign.

Shelby Jones

Signature

03/04/2025

Date

1 ROB BONTA
Attorney General of California
2 CAITLIN W. NOBLE
Supervising Deputy Attorney General
3 KIM KASRELIOVICH
Deputy Attorney General
4 State Bar No. 261766
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013-1230
Telephone: (213) 269-6473
6 Fax: (916) 731-3637
E-mail: Kim.Kasreliovich@doj.ca.gov
7 *Attorneys for the Registrar,
Registry of Charities and Fundraisers*

8
9 **BEFORE THE**
10 **ATTORNEY GENERAL**
11 **STATE OF CALIFORNIA**
12

13 In the Matter of the Order to Cease and Desist
14 Against:

Case No. 2025 - FP0003456

15 **FLIPCAUSE AND SEAN WHEELER,**
16

STATEMENT TO RESPONDENTS

17 Respondents.
18
19

20 **TO RESPONDENTS:**

21 Enclosed is a copy of the Order to Cease and Desist that has been filed with the Attorney
22 General of California and that is now served on you.

23 Unless a written appeal and request for a hearing is received within 30 days from the date
24 this document was mailed, you will be deemed to have waived your right to appeal and a hearing
25 and the attached Order to Cease and Desist will become the Attorney General's final order. **THE**
26 **FILING OF AN APPEAL DOES NOT STAY THE EFFECT OF THE CEASE AND**
27 **DESIST ORDER.**
28

1 The request for hearing may be made by delivering or mailing the enclosed form entitled
2 “Appeal and Request for Hearing” to:

3
4 **Kim Kasrelivich, Deputy Attorney General**
5 **Office of the Attorney General**
6 **300 South Spring Street, Suite 1702**
7 **Los Angeles, CA 90013**
8 Jami.Cantore@doj.ca.gov

9 You are not required to use the attached form, however, the appeal must be in writing and
10 must contain the name, the entity affiliation (if any), the address and phone number of the person
11 appealing, the registration number and a statement of the basis of the appeal.

12 Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are enclosed.

13 If you desire the names and addresses of witnesses or an opportunity to inspect and copy
14 the items mentioned in section 11507.6 of the Government Code in the possession, custody or
15 control of the Board you may send a Request for Discovery to the above designated Deputy
16 Attorney General.

17 **NOTICE REGARDING SETTLEMENTS**

18 It may be possible to avoid the time, expense and uncertainties involved in an
19 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated
20 settlement is a binding written agreement between you and the government regarding the matters
21 charged and the effect of the order. Such a stipulation would have to be approved by the
22 Registrar but once approved, will be incorporated into a final order.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 If you are interested in pursuing this alternative to a formal administrative hearing, or if you
2 have any questions, you or your attorney should promptly contact Deputy Attorney General Kim
3 Kasreliovich.

4
5
6 Dated: November 12, 2025

Respectfully submitted,

7 ROB BONTA
Attorney General of California
8 CAITLIN W. NOBLE
Supervising Deputy Attorney General

9
10 

11 KIM KASRELIOVICH
Deputy Attorney General
12 *Attorneys for the Registry of Charities and*
13 *Fundraisers*

14
15
16
17 SF2025402369
68063521

APPEAL AND REQUEST FOR HEARING

_____(name),
_____(title/affiliation to organization,
if any) of
_____(organization, if any),

appeals and requests a hearing of the Cease and Desist Order as set forth in Government Code sections 12591.1, and 12598 subdivision (e).

Appellant's address (required):

_____ telephone number (required).

Statement for basis of appeal (required): _____

_____.

☐ Check this box if you are attaching additional information or documents.

Date

Signature

ADMINISTRATIVE DISCOVERY PROVISIONS

Government Code § 11507.5

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

Government Code § 11507.6

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

- (a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;
- (b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;
- (c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;
- (d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;
- (e) Any other writing or thing which is relevant and which would be admissible in evidence;
- (f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product

Government Code § 11507.7

- (a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.
- (b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.
- (c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.
- (d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.
- (e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.
- (f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

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Registry of Charities and Fundraisers*

8
9 **BEFORE THE**
10 **ATTORNEY GENERAL**
11 **STATE OF CALIFORNIA**
12

13 In the Matter of the Order to Cease and Desist
14 Against:

15 **FLIPCAUSE AND SEAN WHEELER,**
16

17 Respondents.
18

Case No. 2025 - FP0003456

REQUEST FOR DISCOVERY

(Government Code, § 11507.6)

19 **TO RESPONDENTS:**

20 Under section 11507.6 of the Government Code of the State of California, parties to an
21 administrative hearing, including the Registrar, are entitled to certain information concerning the
22 opposing party's case.

23 PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU ARE
24 HEREBY REQUESTED TO:

25 1. Provide the names and addresses of witnesses to the extent known to the
26 Respondents, including, but not limited to, those intended to be called to testify at the hearing,
27 and
28

1 2. Provide an opportunity for the Registrar to inspect and make a copy of any of the
2 following in the possession or custody or under control of the Respondents:

3 a. A statement of a person, other than the Respondents, named in the initial
4 administrative pleading, or in any additional pleading, when it is claimed that the act
5 or omission of the Respondents as to this person is the basis for the administrative
6 proceeding;

7 b. A statement pertaining to the subject matter of the proceeding made by
8 any party to another party or persons;

9 c. Statements of witnesses then proposed to be called by the Respondents
10 and of other persons having personal knowledge of the acts, omissions or events
11 which are the basis for the proceeding, not included in (a) or (b) above;

12 d. All writings, including but not limited to reports of mental, physical and
13 blood examinations and things which the Respondents now proposes to offer in
14 evidence;

15 e. Any other writing or thing which is relevant and which would be
16 admissible in evidence, including but not limited to, any patient or hospital records
17 pertaining to the persons named in the pleading;

18 f. Investigative reports made by or on behalf of the Respondents pertaining
19 to the subject matter of the proceeding, to the extent that these reports (1) contain
20 the names and addresses of witnesses or of persons having personal knowledge of
21 the acts, omissions or events which are the basis for the proceeding, or (2) reflect
22 matters perceived by the investigator in the course of his or her investigation, or (3)
23 contain or include by attachment any statement or writing described in (a) to (e),
24 inclusive, or summary thereof.

25 For the purpose of this Request for Discovery, "statements" include written statements by
26 the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical
27 or other recordings, or transcripts thereof, of oral statements by the person, and written reports or
28 summaries of these oral statements.

1 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for Discovery
2 should be deemed to authorize the inspection or copying of any writing or thing which is
3 privileged from disclosure by law or otherwise made confidential or protected as attorney's work
4 product.

5 Your response to this Request for Discovery must be made within 30 days to:

6 **Kim Kasreliovich, Deputy Attorney General**
7 **Office of the Attorney General**
8 **300 South Spring Street, Suite 1702**
9 **Los Angeles, CA 90013.**
10 Jami.Cantore@doj.ca.gov

11 Failure without substantial justification to comply with this Request for Discovery may
12 subject you to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30 of the
13 Government Code.

14 Dated: November 12, 2025

Respectfully submitted,

15 ROB BONTA
16 Attorney General of California
17 CAITLIN W. NOBLE
18 Supervising Deputy Attorney General



19 KIM KASRELIQVICH
20 Deputy Attorney General
21 *Attorneys for the Registry of Charities and*
22 *Fundraisers*

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