



# California Fair Political Practices Commission

March 15, 1988

Jim Farha  
President/Chairman of the Board  
Vacaville Chamber of Commerce  
400 East Monte Vista Avenue  
Vacaville, CA 95688

Re: Our File No. I-88-097

Dear Mr. Farha:

We have received your letter suggesting a modification of the conflict-of-interest provisions of the Political Reform Act.<sup>1/</sup> Presently, a public official is prohibited from participating in a governmental decision in which the official has a financial interest. (Section 87100.) An official has a financial interest in a decision if it will have a reasonably foreseeable material financial effect on a source of income to the official of \$250 or more in the 12 months before the decision. (Section 87103.)

Your organization has suggested that the \$250 threshold is too low. You have asked the Commission to increase the threshold to \$1,000. However, the Commission has no authority to modify the threshold because it is a part of the statute. Any change in the threshold will require legislation. Accordingly, your suggestion would be more appropriately addressed to your elected representatives in the Legislature.

If you have any questions, please contact me at (916) 322-5901.

Sincerely,

Diane M. Griffiths  
General Counsel

By: John G. McLean  
Counsel, Legal Division

DMG:JGM:jaj

---

<sup>1/</sup> Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated.



F P P C  
MAR 7 2 00 PM '88

March 3, 1988

State Fair Political Practices Commission  
Legal Division  
428 "J" Street  
Suite 800  
Sacramento, California 95814

Attention: Jeanette Turvill

The Vacaville Chamber of Commerce Legislative Action Committee and the Board of Directors have reviewed the FPPC's rules and regulations as they deal with the "Conflict of Interest", specifically with city elected or appointed officials.

As we understand this particular section, a public official must abstain from any debate or vote which could significantly affect their financial interest. The financial interests include business investments and real property holdings. In fact, any source of income or gifts of \$250 or more within the past twelve months.

We certainly agree, if a significant financial enhancement is to be realized by voting either "yea" or "nay", the elected or appointed official must declare that interest. However, it is our belief that the amount adopted in 1974 of \$250 as it relates to "Conflict of Interest" is totally unrealistic in today's financial world. Therefore, we urge the FPPC to increase the threshold of \$250 to \$1,000 as it relates to city elected and appointed officials. And, furthermore, the \$1,000 (real dollar amount) be adjusted annually to coincide with the State of California index when determining the cost of living percentages.

Thank you for considering our request, and we look forward to hearing from you.

Sincerely,

JIM FARHA  
President/Chairman of the Board  
Vacaville Chamber of Commerce

JF:nam

**Vacaville Chamber of Commerce**

400 East Monte Vista Ave. • Vacaville, California 95688 • Telephone (707) 448-6424