

STATEMENT OF ECONOMIC INTERESTS

RECEIVED Date Initial Filing
CITY OF MILLBRAE Received
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FAIR POLITICAL
COMMISSION
COVER PAGE

MAR 23 2015



Please type or print in ink.

NAME OF FILER (LAST) Gottschalk (FIRST) Robert (MIDDLE) George

1. Office, Agency, or Court

Agency Name (Do not use acronyms)

City of Millbrae

Division, Board, Department, District, if applicable

City Council

Your Position

City Council Member

► If filing for multiple positions, list below or on an attachment. (Do not use acronyms)

Agency: Housing Endowment and Regional Trust

Position: Board Member

San Mateo County Library Joint Powers Board

Board Member

2. Jurisdiction of Office (Check at least one box)

State

Judge or Court Commissioner (Statewide Jurisdiction)

Multi-County _____

County of San Mateo

City of Millbrae

Other _____

3. Type of Statement (Check at least one box)

Annual: The period covered is January 1, 2014, through December 31, 2014.

Leaving Office: Date Left ____/____/____ (Check one)

-or- The period covered is ____/____/____, through December 31, 2014.

The period covered is January 1, 2014, through the date of leaving office.

Assuming Office: Date assumed ____/____/____

The period covered is ____/____/____, through the date of leaving office.

Candidate: Election year _____ and office sought, if different than Part 1: _____

4. Schedule Summary

Check applicable schedules or "None."

► Total number of pages including this cover page: 12

Schedule A-1 - Investments - schedule attached

Schedule C - Income, Loans, & Business Positions - schedule attached

Schedule A-2 - Investments - schedule attached

Schedule D - Income - Gifts - schedule attached

Schedule B - Real Property - schedule attached

Schedule E - Income - Gifts - Travel Payments - schedule attached

-or-

None - No reportable interests on any schedule

I certify under penalty of perjury under the laws of the

Date Signed 03/19/2015

(month, day, year)

**SCHEDULE A-1
Investments**

Stocks, Bonds, and Other Interests
(Ownership Interest is Less Than 10%)

Do not attach brokerage or financial statements.

CALIFORNIA FORM 700
FAIR POLITICAL PRACTICES COMMISSION

Name
Robert G. Gottschalk

▶ NAME OF BUSINESS ENTITY
Wells Fargo & Co. New (WFC)

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____/_____/14 _____/_____/14
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____/_____/14 _____/_____/14
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY
Honeywell International, Inc. (HON)

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____/_____/14 _____/_____/14
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____/_____/14 _____/_____/14
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____/_____/14 _____/_____/14
 ACQUIRED DISPOSED

▶ NAME OF BUSINESS ENTITY

GENERAL DESCRIPTION OF THIS BUSINESS

FAIR MARKET VALUE
 \$2,000 - \$10,000 \$10,001 - \$100,000
 \$100,001 - \$1,000,000 Over \$1,000,000

NATURE OF INVESTMENT
 Stock Other _____
(Describe)
 Partnership Income Received of \$0 - \$499
 Income Received of \$500 or More (Report on Schedule C)

IF APPLICABLE, LIST DATE:
 _____/_____/14 _____/_____/14
 ACQUIRED DISPOSED

Comments: _____

SCHEDULE D
Income – Gifts

Name
Robert G. Gottschalk

▶ NAME OF SOURCE (Not an Acronym)
South San Francisco Scavenger Company
 ADDRESS (Business Address Acceptable)
500 East Jamie Court, South San Francisco
 BUSINESS ACTIVITY, IF ANY, OF SOURCE
Waste Disposal

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
<u>12 / 22 / 14</u>	<u>\$ 48.00</u>	<u>Food Basket</u>
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>

▶ NAME OF SOURCE (Not an Acronym)
George Lam
 ADDRESS (Business Address Acceptable)
888 Brannan Street, San Francisco, CA 94108
 BUSINESS ACTIVITY, IF ANY, OF SOURCE
Jewelry and Real Estate

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
<u>03 / 15 / 14</u>	<u>\$ 50.00</u>	<u>Dinner</u>
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>

▶ NAME OF SOURCE (Not an Acronym)
Japan Consul General Mr. Watanabe
 ADDRESS (Business Address Acceptable)
2700 Vallejo Street, San Francisco, CA
 BUSINESS ACTIVITY, IF ANY, OF SOURCE
Japanese Government

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
<u>12 / 05 / 14</u>	<u>\$ 65.00</u>	<u>Dinner</u>
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>
<u> / / </u>	<u>\$ </u>	<u> </u>

Comments: _____

SCHEDULE D
Income – Gifts

Name
 Robert G. Gottschalk

▶ NAME OF SOURCE (Not an Acronym)
 Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
 Foreign Countries 1 Taijichang St. Beijing 100740
 BUSINESS ACTIVITY, IF ANY, OF SOURCE
 non-profit

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
06 / 19 / 14	\$ _____	Cultural Visits (include
_____ / _____ / _____	\$ 112.00	Great Wall/China
06 / 25 / 14	\$ _____	Folk Cultural Village)

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____

▶ NAME OF SOURCE (Not an Acronym)
 Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
 Foreign Countries 1 Taijichang St. Beijing 100740
 BUSINESS ACTIVITY, IF ANY, OF SOURCE
 non-profit

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
06 / 20 / 14	\$ 35.00	Cruise Huangpu River
_____ / _____ / _____	\$ _____	Shanghai
_____ / _____ / _____	\$ _____	_____

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____

▶ NAME OF SOURCE (Not an Acronym)
 Overseas Chinese Affairs Office of the State Council
 ADDRESS (Business Address Acceptable)
 35 Fuchengmenwai St. Beijing 100037 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
06 / 22 / 14	\$ 24.00	Boat Cruise Wuhan
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 BUSINESS ACTIVITY, IF ANY, OF SOURCE

DATE (mm/dd/yy)	VALUE	DESCRIPTION OF GIFT(S)
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____
_____ / _____ / _____	\$ _____	_____

Comments: Per FPPC file Nos. 14-071, 14-072, 14-078 & 14-079 request for advice, these payments are not subject to the gift limits because they will be provided in connection with a legislative or governmental purpose by both a foreign government and 501 (c)(3) organization. See attached

SCHEDULE E
Income – Gifts
Travel Payments, Advances,
and Reimbursements

Name
 Robert G. Gottschalk

- Mark either the gift or income box.
- Mark the "501(c)(3)" box for a travel payment received from a nonprofit 501(c)(3) organization or the "Speech" box if you made a speech or participated in a panel. These payments are not subject to the \$440 gift limit, but may result in a disqualifying conflict of interest.

▶ NAME OF SOURCE (Not an Acronym)
 American Asian Economic & Cultural Association

ADDRESS (Business Address Acceptable)
 3140 De La Cruz Blvd. #200

CITY AND STATE
 Santa Clara, CA 95054

BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
 non-profit

DATE(S): 06 / 16 / 14 - 06 / 17 / 14 AMT: \$ 675.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
flight CA986 SFO to PEK

▶ NAME OF SOURCE (Not an Acronym)
 Chinese People's Association for Friendship with

ADDRESS (Business Address Acceptable)
 Foreign Countires 1 Taijichang St.

CITY AND STATE
 Beijing 100740 PRC

BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
 non-profit

DATE(S): 06 / 19 / 14 - 06 / 19 / 14 AMT: \$ 148.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
High Speed Train Beijing to Shanghai

▶ NAME OF SOURCE (Not an Acronym)
 Chinese People's Association for Friendship with

ADDRESS (Business Address Acceptable)
 Foreign Countries 1 Taijichang St.

CITY AND STATE
 Beijing 100740 PRC

BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
 non-profit

DATE(S): 06 / 17 / 14 - 06 / 18 / 14 AMT: \$ 206.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
Two nights stay at the Park Plaza Hotel Beijing

▶ NAME OF SOURCE (Not an Acronym)
 Chinese People's Association for Friendship with

ADDRESS (Business Address Acceptable)
 Foreign Countries 1 Taijichang St.

CITY AND STATE
 Beijing 100740 PRC

BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
 non-profit

DATE(S): 06 / 19 / 14 - 06 / 21 / 14 AMT: \$ 357.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
Three nights stay at the Jinjiang Hotel Shanghai

Comments: Per FPPC file Nos. 14-071, 14-072, 14-078 & 14-079 request for advice, these payments are not subject to the gift limits because they will be provided in connection with a legislative or governmental purpose by both a foreign government and 501(c)(3) organization. See attached.

SCHEDULE E
Income – Gifts
Travel Payments, Advances,
and Reimbursements

Name
 Robert G. Gottschalk

- Mark either the gift or income box.
- Mark the "501(c)(3)" box for a travel payment received from a nonprofit 501(c)(3) organization or the "Speech" box if you made a speech or participated in a panel. These payments are not subject to the \$440 gift limit, but may result in a disqualifying conflict of interest.

▶ NAME OF SOURCE (Not an Acronym)
Overseas Chinese Affairs Office of the State Council
 ADDRESS (Business Address Acceptable)
35 Fuchengmenwai St.
 CITY AND STATE
Beijing 100037 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 22 / 14 - 06 / 23 / 14 AMT: \$ 128.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
Two nights stay at the East Lake Conference Center
Wuhan

▶ NAME OF SOURCE (Not an Acronym)
Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
Foreign Countires 1 Taijichang St.
 CITY AND STATE
Beijing 100740 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 24 / 14 - 06 / 24 / 14 AMT: \$ 151.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
flight CA3353 WUH to SZX

▶ NAME OF SOURCE (Not an Acronym)
Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
Foreign Countries 1 Taijichang St.
 CITY AND STATE
Beijing 100740 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 22 / 14 - 06 / 22 / 14 AMT: \$ 152.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
flight MU2508 SHA to WUH

▶ NAME OF SOURCE (Not an Acronym)
Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
Foreign Countries 1 Taijichang St.
 CITY AND STATE
Beijing 100740 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 24 / 14 - 06 / 26 / 14 AMT: \$ 372.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income

Made a Speech/Participated in a Panel

Other - Provide Description _____
Three nights stay at the Shenzhenair International
Hotel Shenzhen

Comments: Per FPPC file Nos. 14-071, 14-072, 14-078 & 14-079 request for advice, these payments are not subject to the gift limits because they will be provided in connection with a legislative or governmental purpose by both a foreign government and 501(c)(3) organization. See attached.

SCHEDULE E
Income – Gifts
Travel Payments, Advances,
and Reimbursements

Name
 Robert G. Gottschalk

- Mark either the gift or income box.
- Mark the "501(c)(3)" box for a travel payment received from a nonprofit 501(c)(3) organization or the "Speech" box if you made a speech or participated in a panel. These payments are not subject to the \$440 gift limit, but may result in a disqualifying conflict of interest.

▶ NAME OF SOURCE (Not an Acronym)
American Asian Economic & Cultural Association
 ADDRESS (Business Address Acceptable)
3140 De La Cruz Blvd. #200
 CITY AND STATE
Santa Clara, CA 95054
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 27 / 14 - 06 / 27 / 14 AMT: \$ 379.10
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description _____
flight CA1308 SZX to PEK

▶ NAME OF SOURCE (Not an Acronym)
Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
Foreign Countires 1 Tajjichang St.
 CITY AND STATE
Beijing 100740 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
non-profit

DATE(S): 06 / 18 / 14 - 06 / 27 / 14 AMT: \$ 266.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description _____
8 days of meals for Beijing, Shanghai, and Shenzhen

▶ NAME OF SOURCE (Not an Acronym)
American Asian Economic & Cultural Association
 ADDRESS (Business Address Acceptable)
3140 De La Cruz Blvd. #200
 CITY AND STATE
Santa Clara, CA 95054
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
non-profit

DATE(S): 06 / 27 / 14 - 06 / 27 / 14 AMT: \$ 525.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description _____
flight CA985 PEK to SFO

▶ NAME OF SOURCE (Not an Acronym)
Chinese People's Association for Friendship with
 ADDRESS (Business Address Acceptable)
Foreign Countries 1 Tajjichang St.
 CITY AND STATE
Beijing 100740 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)
non-profit

DATE(S): 06 / 17 / 14 - 06 / 27 / 14 AMT: \$ 137.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description _____
8 days of bus rental fee for Beijing, Shanghai, and Shenzhen

Comments: Per FPPC file Nos. 14-071, 14-072, 14-078 & 14-079 request for advice, these payments are not subject to the gift limits because they will be provided in connection with a legislative or governmental purpose by both a foreign government and 501(c)(3) organization. See attached.

SCHEDULE E
Income – Gifts
Travel Payments, Advances,
and Reimbursements

Name
Robert G. Gottschalk

- Mark either the gift or income box.
- Mark the "501(c)(3)" box for a travel payment received from a nonprofit 501(c)(3) organization or the "Speech" box if you made a speech or participated in a panel. These payments are not subject to the \$440 gift limit, but may result in a disqualifying conflict of interest.

▶ NAME OF SOURCE (Not an Acronym)
Overseas Chinese Affairs Office of the State Council
 ADDRESS (Business Address Acceptable)
35 Fuchengmenwai St.
 CITY AND STATE
Beijing 100037 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 22 / 14 - 06 / 24 / 14 AMT: \$ 39.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description 3 days fo bus rental fees in Wuhan

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 CITY AND STATE
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): _____ AMT: \$ _____
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description _____

▶ NAME OF SOURCE (Not an Acronym)
Overseas Chinese Affairs Office of the State Council
 ADDRESS (Business Address Acceptable)
35 Fuchengmenwai St.
 CITY AND STATE
Beijing 100037 PRC
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): 06 / 22 / 14 - 06 / 24 / 14 AMT: \$ 72.00
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description 3 days of meals for Wuhan

▶ NAME OF SOURCE (Not an Acronym)
 ADDRESS (Business Address Acceptable)
 CITY AND STATE
 BUSINESS ACTIVITY, IF ANY, OF SOURCE 501 (c)(3)

DATE(S): _____ AMT: \$ _____
 (If gift)

TYPE OF PAYMENT: (must check one) Gift Income
 Made a Speech/Participated in a Panel
 Other - Provide Description _____

Comments: Per FPPC file Nos. 14-071, 14-072, 14-078 & 14-079 request for advice, these payments are not subject to the gift limits because they will be provided in connection with a legislative or governmental purpose by both a foreign government and 501(c)(3) organization. See attached.



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

May 9, 2014

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Office of the City Attorney
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Hayward, CA 94541-5007

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Menlo Park, CA 94025

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County Counsel
70 West Hedding Street
East Wing 9th Floor
San Jose, CA 95110-1770

Re: Your Requests for Advice
Our File Nos. 14-071, 14-072, 14-078 & 14-079

Dear Counsel:

This letter responds to your collective requests for advice regarding the gift provisions of the Political Reform Act (the "Act").¹ Please note that the Fair Political Practices Commission (the "Commission") does not act as a finder of fact when it renders advice, (*In re Oglesby* (1975) 1 FPPC Ops. 71), and our advice is based solely on the provisions of the Act.

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

QUESTION

Are payments for travel, lodging and subsistence made to the Mayors participating in the Silicon Valley Mayors' China Trip in June 2014 subject to reporting and gift limits?²

CONCLUSION

Payments for the Mayors' travel, lodging and subsistence are reportable gifts, not subject to gift limits because they will be provided in connection with a legislative or governmental purpose by both a foreign government and a 501(c)(3) organization. Any other payments will be reportable gifts subject to gift limits.

FACTS

Twelve Mayors have been invited to travel to China from June 16-27, 2014, as part of the Silicon Valley Mayors' China Trip. The purpose of this all-expenses paid trip is to facilitate investment and international trade between China and the Silicon Valley region. While in China, the delegation will visit Beijing, Shanghai, Wuhan and Shenzhen. In addition, they will have the opportunity to participate in meetings with local government officials and CEOs from top local high tech companies.

As mentioned, this is an all-expenses paid trip. The international air travel expenses to and from China, approximately \$2,000 per person, will be covered by the American Asian Economic and Cultural Association ("AAECA"), a 501(c)(3) tax exempt organization. The remaining expenses which include travel, lodging and meals within China, approximately \$3,000 per person, will be paid for by the city governments of the four cities visited by the Mayors. Thus, the estimated market value of the trip is roughly \$5,000 per participant.³

The principal purpose of the trip involves facilitating investment and international trade between China and the Silicon Valley, and the Mayors are attending in their official capacities to

² We received requests for advice on behalf of Mayors Dutra-Vernaci, Mueller and Mayor Pro Tem Salinas. Because the requests all share the same facts and issues, we are treating them as a single request. Also, this advice applies to the remaining Mayors traveling as part of the delegation to China from June 16-27, 2014, assuming the sources of funding are the same as those provided herein.

³ We note that initially there was some confusion as to whether China Silicon Valley Business Development ("China SV") and/or another organization, Chinese People's Association for Friendship with Foreign Countries ("CPAFFC"), were paying for these expenses. However, it was confirmed by counsel for Mayor Dutra-Vernaci that China SV is only coordinating and sponsoring the trip, not providing any funds or services with monetary value. In addition, the city governments of the four cities being visited are coordinating their payments of the participants' expenses while in China through CPAFFC, making the four city governments the true source of those payments. (See Regulation 18945(a) ["The person who makes the gift to the official(s) is the source of the gift unless that person is acting as an intermediary".]) Based on the facts provided, CPAFFC is simply an intermediary for the payments provided by the four city governments.