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March 13, 2012

Chair Ann Ravel and Commissioners
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, CA 95814

RE: Agenda Item 42: Regulation 18215.3

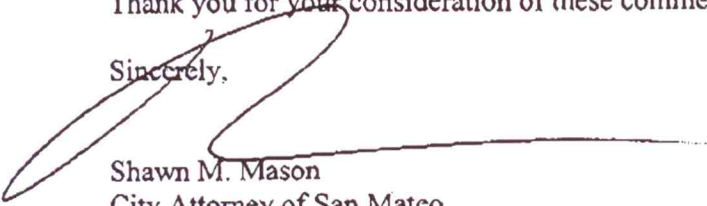
Dear Chair Ravel and Commissioners:

On behalf of the League of California Cities City Attorneys FPPC Committee, I submit this letter for comment on the above-referenced agenda item. The Committee made comments at the Interested Persons meetings held on this item, and find that the Committee's interests as expressed in those meetings have been substantially addressed in staff's proposed regulation.

The Committee understands the public interest in disclosure of charitable payments made at the behest of a public official. At the same time, public officials are frequently involved in organizations that do good within their communities. We believe that staff has struck the appropriate balance between these interests by excepting from the "behesting" rule the mailing of a letter on letterhead that merely lists the name of a public official without "featuring" the official.

Thank you for your consideration of these comments.

Sincerely,


Shawn M. Mason
City Attorney of San Mateo
Chair, League of Cities FPPC Committee