

## Sasha Linker

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**From:** Teresa Stricker <teresa\_stricker@ci.richmond.ca.us>  
**Sent:** Wednesday, May 19, 2021 7:16 PM  
**To:** CommAsst  
**Cc:** dbaindbridge@fppc.ca.gov  
**Subject:** Comment on Item 9 on 5/20/21 FPPC Agenda

### EXTERNAL EMAIL

Dear Chair Miadich and Commissioners Cardenas, Wilson, Wood and Baker:

I chair the League of California Cities' FPPC Committee of the City Attorneys' Department (Committee). The Committee is comprised exclusively of city attorneys who provide Political Reform Act (the "Act") guidance to public officials on a regular basis.

On the agenda for the FPPC's May 20, 2021, agenda is a request from the California State Association of Counties ("CSAC") and California School Board Association ("CSBA") for an opinion from the FPPC on the interpretation of FPPC Regulations 18420.1 and 18901.1. Specifically, CSAC and CSBA ask:

Do the Act and FPPC Regulations 18420.1 and 18901.1 create a per se reportable campaign expenditure whenever public agencies engaged in communications regarding ballot measures through the means of television, radio, and electronic media (including social media), regardless of the content of the communications?

There is a strong need for the FPPC to clarify for public officials statewide the extent to which public agency communications regarding ballot measures made through television, radio, or electronic media constitute campaign material under applicable FPPC regulations. The Committee believes that advice along the lines of what FPPC staff recommends would provide valuable context to the regulations.

Thank you for your consideration.

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