



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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First Quarter Update 2026

Conflict of Interest, Revolving Door, and Statement of Economic Interests

Regulations adopted by the Commission

The following are regulatory changes approved by the Commission during the past quarter concerning conflict of interest, revolving door, and statement of economic interests. To receive updates for all regulations before the Commission, please sign up for our [mailing list here](#).

None.

Advice Letters

The following are advice letters issued by the Commission's Legal Division during the past quarter concerning questions about conflicts of interest, revolving door, or statement of economic interests. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Conflict of Interest

Kevin G. Ennis - [A-25-135](#)

Under the Act, a housing board member is permitted to take part in governmental decisions involving regulations affecting landlord-tenant rights, the review of recent legislation, and subsequent decisions relating to the implementation of that legislation. While it is reasonably foreseeable that the decisions may have a material effect on the board member's four rental properties, as well as the residence she rents as a tenant, the facts provided indicate that the public generally exception applies as the decisions will have an effect on a significant segment of the public and there is no indication of a unique effect on the official's interests.

Karl H. Berger - [A-25-147](#)

Based on his employer's projected revenue of approximately \$18 million, it is reasonably foreseeable that decisions concerning the data center project will have a material financial effect on the councilmember's employer, an energy company. Additionally, it is reasonably foreseeable that decisions concerning a separate capital improvement project will have a material financial effect on the councilmember's real property interest, located within 500 feet of the project. Accordingly, the councilmember is prohibited from taking part in these decisions, and facts do not indicate that the public generally exception applies.

Justin Hopkins - [A-25-152](#)

District board members are prohibited from participating in governmental decisions regarding a new water rate structure that would increase the water rate assessed to a small number of the district's water customers, including themselves, because the decision would have a financial effect on their respective real properties. The public generally exception, including the specific exception for public services and utilities, does not apply to the decisions because the decisions would implement a new rate structure.

Kane Thuyen - [A-25-166](#)

A city councilmember is prohibited from taking part in governmental decisions involving the budget allocation for rental property-related regulations and programs because it is reasonably foreseeable that the decisions would have a material financial effect on his economic interest in four residential rental properties. Moreover, the public generally exception does not apply due to the cumulative effect on the councilmember's four properties.

Ryan R. Plotz - [A-25-167](#)

Improvement district director has a disqualifying financial interest in a decision to award a construction contract to build a multi-court sports facility on a district-owned parcel because it is reasonably foreseeable that the decision will have a material effect on property 378 feet from the parcel, which is owned by a limited liability company in which her spouse has a one-third ownership interest. The public generally exception does not apply because the official has not established that a significant segment is affected by the decision, and the facts indicate that the decision will have a unique effect on the official's property and its tenant (a brewery and restaurant), given that it is within close walking distance of the project.

Diana Nuricumbo – [A-25-151](#)

A city councilmember does not have a conflict of interest in a decision to initiate a forensic audit of a bond used to fund infrastructure for the subdivision in which the official owns a residence because the potential financial effect of the decision to undertake the audit is nominal, inconsequential, or insignificant. Additionally, the councilmember does not have a conflict of interest in a decision to construct an entrance to the subdivision because the Limited Neighborhood Effects Exception applies. The councilmember does, however, have a conflict of interest in a decision to proceed with foreclosure on undeveloped land originally part of the same subdivision and subject to the same bond, because the decision would allow for the sale and development of the property, and it is reasonably foreseeable that the decision would have a material financial effect on the councilmember's residence.

Paul Solis – [A-26-002](#)

The Act prohibits a board member from taking part in governmental decisions relating to a proposed location for a rail station entrance because it is reasonably foreseeable that the decision may have a material financial effect on the board member's interest in real property located within 1,000 feet of the proposed entrance. To the extent that the decisions can be segmented, the board member may be permitted to take part in decisions not involving those parcels within 1,000 feet of the board member's property.

Henry Castillo – [A-26-004](#)

The Act prohibits a mayor from taking part in governmental decisions relating to changes/improvements to a park because it is reasonably foreseeable that the decisions may have a material financial effect on the mayor's interest in his primary residence located within 500 feet of the park.

Jeffrey A. Ballinger – [A-26-007](#)

The Act does not prohibit a councilmember from taking part in decisions related to implementing recommendations from a parking study, notwithstanding the councilmember's residential property located within 500 feet of the study area. Based on the facts provided, the public generally exception, for a decision with a "Limited Neighborhood Effect," applies as the study area encompasses more than 50 residential properties, there will be no unique financial effect on the official's interests, and the decisions will be based upon the recommendations of the study.

Yolanda Summerhill – [A-26-006](#)

City mayor has a financial interest in spouse's real estate brokerage clients, from which the spouse has received or expects to receive commission income of \$1,000 or more within the 12 months prior to the relevant decisions, as a source of income. Under the applicable materiality standard, the city mayor may not take part in decisions if the city mayor knows or has reason to know the client has property that is explicitly involved in the decision, including any decision involving a development plan or criteria applying to the sources' real properties, or which will determine the zoning or rezoning of the property. Based on the facts provided, the client's property is explicitly involved in the decisions. Therefore, it is reasonably foreseeable that the decisions will have a material financial effect on the client, and the city mayor may not take part in the decisions. Additionally, the public generally exception does not apply due to the unique effect of the decisions on the client's multiple properties.

Linda A. Nemeroff – [A-26-012](#)

Members of a local government agency's deferred compensation plan committee, who have decision-making authority over the management of the plan's investments, are public officials who manage public investments subject to full disclosure of their economic interests under the Act. Additionally, each member must file a Form 700, Statement of Economic Interests, with the Commission.

Kristopher J. Kokotaylo – [A-26-014](#)

A councilmember who resides less than 1,000 feet away from a fire station and a cultural arts center proposed in the city's capital improvement plan does not have an economic interest under the Act when she has a month-to-month tenancy in her residence. Barring a financial effect on an economic interest specified under the Act, the councilmember may take part in the decisions.

Gregory J. Rubens – [A-26-017](#)

A councilmember has a disqualifying financial interest and may not take part in governmental decisions regarding a proposed project that would add amenities to a city park located 241 feet from the councilmember's real property. Under applicable regulations, it is reasonably foreseeable that the decisions will have a material financial effect on the councilmember's

property, which is within 500 feet of the project, unless there is clear and convincing evidence that the project decisions will have no measurable impact on the councilmember's property.

Section 1090

Joshua Nelson - [A-25-133\(a\)](#)

An agency is not prohibited from entering into a contract with a bidder under Section 1090 where the agency's former adviser on the contract has no financial interest in the bidder, had no participation in the bidder's response to a request for proposals, and their short-term independent contract work for the bidder has ended and was wholly unrelated to the contract.

Abel Salinas – [A-25-094](#)

For purposes of the Act and a contract between a water board and a city, a regional water board member does not have a disqualifying source of income interest as a result of income received through his consulting businesses as an independent contractor for the city. Based on the facts provided, the contract will not have a unique effect on the official's business. Therefore, the board member may take part in decisions regarding the contract. Similarly, Section 1090 does not prohibit the board member from participating in the agreement, because the noninterest exception of Section 1091.5(a)(9) would apply, so long as the director's interest in the income from the city is disclosed to the board and noted in the board's official records.

Daniel D. Sodergren – [A-25-141](#)

Section 1090 does not prohibit a city from entering an energy services contract with a company under which the company will provide preliminary program development, at no cost to the city, but also contemplates that the contract will be amended at a later date to include implementation of the project's work. Based on the facts provided, the city would retain discretion to implement the project, amend the contract, and determine the desired scope and phasing for its implementation. Moreover, the company would have no ability to use its position under the initial contract to improperly influence the city to enter an amended contract. Accordingly, the company would not be an "officer" under Section 1097.6, and Section 1090 would not prohibit the city from contracting with the company for its initial services or from amending the contract to implement the project.

Victoria Grotewohl – [A-25-145](#)

Under Section 1090, a state department's director of nursing, who is also employed by a college as a part-time adjunct professor in its nursing program, has a potential financial interest in a contract between the department and the college for its nursing students to perform educational clinical rotations at one of the department's veteran homes. However, the noninterest exception under Section 1091(b)(3) applies because both the department and the college would be receiving public services generally provided by the department on the same terms and conditions as any other recipient of the services. Similarly, the official can take part in the decisions under the Act. Based on the facts provided, the director's income from the college falls within an exception for government salary and is not disqualifying income. Additionally, the facts provided do not indicate any effect on the director's personal finances.

Donna Mooney – [A-25-154](#)

A municipal utility board member, who is also an employee of an electric company, may not take part in decisions regarding an interconnection agreement with the company providing electricity to the municipal utility. Under the Act, because the company is a named party in any decision regarding the agreement, it is reasonably foreseeable that the agreement would have a material financial effect on the board member's interests in the employer. Additionally, under Section 1090, the board member has a remote interest in the agreement with the employer. However, the municipal utility may enter into the agreement provided the board member does not participate in any manner and recuses herself in accordance with Section 1091 and the Act.

Heidi Van Tongeln – [A-25-156](#)

A councilmember may not take part in decisions regarding the relocation of a housing shelter. Under the Act, it is reasonably foreseeable that the decisions will have a material financial effect on the councilmember's leased residence, because the decision will affect the councilmember's use and enjoyment of the residence located approximately 840 feet from the shelter. However, under Section 1090, the proximity of the councilmember's residence to the shelter does not alone establish a prohibited financial interest in a contract involving the shelter. Thus, the city is not prohibited from entering into a contract involving the shelter, notwithstanding the determination that the councilmember is prohibited from taking part in the contract under the Act.

Adrienne Barnes – [A-25-161](#)

Under Section 1090, a nonprofit public charter school board member, who is also employed by a different nonprofit public charter school operator, has a remote interest in board decisions regarding a contract for human resources services with the employer. Accordingly, the board member may not participate in the making of the contract. However, the board may enter into such an agreement, provided the official does not participate in any manner and recuses herself in accordance with Section 1091 and the Act.

Louis Cretaro Jr. – [A-25-168](#)

A business that hires a former public agency consultant, who is subject to Section 1090 and participated in the formation of a proposed contract, is prohibited from entering the contract because the former consultant may not take a financial interest in the contract. Under the Act's one-year ban, the consultant is a former governmental official and is generally prohibited from appearing before or communicating with their former agency on behalf of another individual or private entity for one year following their governmental employment. Additionally, the permanent ban potentially applies to governmental proceedings in which the consultant previously participated.

Conor Harkins – [A-26-010](#)

Where a mayor is a non-compensated officer of the nonprofit organization, the Act does not prohibit the mayor from taking part in decisions regarding a grant to the nonprofit. So long as the mayor receives no income from the nonprofit, the mayor does not have a financial interest in the decisions for purposes of the Act. Additionally, Section 1090 does not prohibit the mayor from taking part in decisions regarding a grant to the nonprofit because the mayor does not receive income from the nonprofit, and the nonprofit has a primary purpose that supports the functions of the city. Thus, the noninterest exception under Section 1091.5(a)(8) applies.

Sigrid Asmundson – [A-25-118](#)

A community services district director, who receives income from a tribe as an employee of the tribe and from her spouse's employment with the tribe, is prohibited under the Act from taking part in a decision to amend a memorandum of understanding for the district to provide services to a tribe. Under the facts provided, it is reasonably foreseeable that the decision will have a material financial effect on the tribe, which is a source of income to the director. Moreover, the governmental salary exception under the Act does not apply to income from a tribe, as the tribe is not a federal, local, or state governmental entity. Similarly, under Section 1090, the director has a financial interest in the agreement. However, the remote interest under Section 1091(b)(13) allows an amended agreement, provided the director abstains from participating in the making of the agreement.

Revolving Door

Greg Doe – [A-26-020](#)

A former state administrative official is not prohibited, under the one-year ban or the permanent ban, from working with a private firm to obtain pharmaceutical rebates for local government entities or government entities in states other than California. Additionally, the permanent ban does not prohibit the former state official from being involved in any new contract between the private firm and their former agency, even though the former state official had worked on a prior contract between the private firm and their former agency.

Commission Opinions

None.

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter involving violations of the Act's conflicts of interest, revolving door, or statement of economic interests. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

Statement of Economic Interests Late Filer/Reporter

[In the Matter of Iraida Pisano; FPPC No. 25/1242.](#) Iraida Pisano, a Planning Commissioner for the City of San Juan Bautista, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Fine: \$200 (Tier One).**

[In the Matter of Kirk Bronsord; FPPC No. 25/761.](#) Kirk Bronsord, Director of the Mosquito Fire Protection District, failed to timely file the Assuming Office Statement of Economic Interests in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Russel Maben; FPPC No. 25/1147. Russel Maben, an Alternate Member for the Rice Commission, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Thara Innocent; FPPC No. 24/816. Thara Innocent, a former Recreation Director for the Los Angeles Department of Recreation and Parks, failed to timely file the Assuming Office, 2020, 2021, 2022, and 2023 Annual, and Leaving Office Statements of Economic Interests, in violation of Government Code Section 87300 (6 counts). **Fine: \$24,000.**

In the Matter of Jesse Huang; FPPC No. 24/501. Jesse Huang, a Recreation Director for the Los Angeles Department of Recreation and Parks, failed to timely file the Assuming Office and 2020, 2021, 2022, and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (5 counts). **Fine: \$15,000.**

In the Matter of Steven Sanchez; FPPC No. 22/887. Staff: Steven Sanchez was a successful candidate for the Franklin-McKinley Elementary School Board in the November 8, 2022 General Election. Sanchez failed to timely file a pre-election campaign statement, in violation of Government Code Sections 84200.5 and 84200.8 (1 count) and four semiannual campaign statements, in violation of Government Code Section 84200 (4 counts). **Fine: \$9,500.**

In the Matter of Marshall Miller; FPPC No. 22/681. Marshall Miller, as Planning Commissioner for the City of Montecito failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). Additionally, Miller failed to timely file an Annual Statement of Economic Interests for 2021, 2022, and 2023, in violation of Government Code Section 87203 (3 counts). **Fine: \$800 (Tier One).**

In the Matter of Cedric Rutland; FPPC No. 25/1243. Cedric Rutland, a Board Member for the California Health Workforce Education and Training Council with the Department of Health Care Access and Information, failed to timely file an Assuming Office, 2022 Annual, and 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (3 counts). **Fine: \$600 (Tier One).**

In the Matter of Arlington La Mica; FPPC No. 25/1125. Arlington La Mica, a Planning Commissioner for the City of Seaside, failed to timely file a 2023 Annual and 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Fine: \$400 (Tier One).**

In the Matter of Benjamin Helber; FPPC No. 26/028. Benjamin Helber, a Planning Commissioner for the City of Moraga, failed to timely file a 2023 Annual and 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Fine: \$400 (Tier One).**

In the Matter of Blane Adams; FPPC No. 26/040. Staff: Blane Adams, a Member of the Board of Directors for the Northern California Regional Liability Excess Fund Joint Powers Authority, failed to timely file a 2023 Annual and 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Fine: \$400 (Tier One).**

In the Matter of Cole Estill; FPPC No. 26/026. Cole Estill, an Alternate Member of the Commission for the Sheep Commission, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Donelle Dadigan; FPPC No. 25/1220. Donelle Dadigan, a Member of the Board of the Endowment for the Cultural and Historical Endowment, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Juan Mondragon; FPPC No. 26/090. Juan Mondragon, a Planning Commissioner for the City of Ridgecrest, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Kaden Bedard; FPPC No. 25/944. Kaden Bedard, a Member for the Santa Barbara County Juvenile Justice Coordinating Council, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Kevin Thompson; FPPC No. 26/007. Kevin Thompson, an Alternate Member/Director of the Board of Directors for the California Intergovernmental Risk Authority, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Kyle Niehues; FPPC No. 26/124. Kyle Niehues, an Alternate Member of the Commission for the Rice Commission, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

In the Matter of Nicole Hokanson; FPPC No. 25/1226. Nicole Hokanson, a Director for the Happy Camp Community Services District, failed to timely file a Leaving Office and an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Fine: \$200 (Tier One).**

In the Matter of Sara Tavakoli; FPPC No. 25/1124. Sara Tavakoli, a Staff Services Manager I for the California Department of Corrections and Rehabilitation, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Fine: \$200 (Tier One).**

Conflicts of Interest

In the Matter of Melanie Bagby; FPPC No. 25/594. Melanie Bagby, former Cloverdale City Councilmember and Sonoma Clean Power Board Member, is the owner of Sirius Mobile Solutions. Bagby violated the Act by making a contract between Sonoma Clean Power and TLCD Architecture and a contract between the City of Cloverdale and Ross Recreation Equipment, in violation of Government Code Sections 1090 and 87100 (2 counts). **Fine: \$9,000.**

In the Matter of Jeneé Littrell; FPPC No. 23/386. Jeneé Littrell was the Deputy Superintendent with the San Mateo County Office of Education. In connection with that position, Littrell participated in a governmental decision that was reasonably foreseeable to have a material financial effect on Littrell's financial interest, in violation of Government Code section 87100 (1 count). Additionally, Littrell failed to timely disclose a financial interest on several Statements of Economic Interest, in violation of Government Code section 87300 (2 counts).
Fine: \$8,000.

Legislation

SB 401 (Hurtado) – PRA Filing Deadline Extensions in Emergency Situations

Short Summary: SB 401 would authorize the commission to extend filing deadlines in the PRA for individuals impacted by a state or local emergency.

Detailed Summary:

Existing law: The PRA imposes deadlines for filing various reports and statements under the PRA, including statements of economic interests, lobbying reports, behested payment reports, and campaign reports and statements.

New authority: SB 401 would authorize the Commission to extend any filing deadline under the PRA for individuals that live in an area impacted by an emergency proclaimed by the Governor or a local governing body pursuant to specified authority.

SB 1389 (Dahle) – Form 700 Late Fee Waiver Authority

Short Summary: SB 1389 would expand the authority for discretionary waiver of the Form 700 late fee in circumstances where the late filing was not willful.

Detailed Summary:

Existing law: Existing law permits filing officers to waive the \$10/day late fee for late Statements of Economic Interests (Form 700s) if the late filing was not willful and enforcement of the liability will not further the purposes of the PRA. Waiver is limited to within 30 days of the original deadline of the Form 700.

Extension of waiver period: The bill would extend the duration of this waiver authority to permit waiver of a late Form 700 up to 30 days after a referral for the late or missing filing is filed with the commission.

AB 1840 (Sanchez) – Prohibition on Using Nonpublic Information Related to Prediction Market Contracts.

Short Summary: AB 1840 prohibits specified individuals from knowingly engaging in the purchase, sale, or exchange of a “prediction market contract” that bets or speculates on the outcome, occurrence, or nonoccurrence of an administrative action, election, governmental decision, or legislative action or decision if the individual possesses, or may obtain, material nonpublic information relating to the purchase, sale or exchange.

Detailed Summary:

New prohibition: AB 1840 would prohibit an elected or appointed public official, an individual required to file a Form 700 (Statement of Economic Interests), or a lobbyist from knowingly engaging in the purchase, sale, or exchange of a “prediction market contract” that bets or speculates on the outcome, occurrence, or nonoccurrence of an administrative action, election, governmental decision made in the course of the individual’s official duties, or any legislative action or decision if the individual possesses, or it is reasonably foreseeable that the individual may obtain in the course of their official duties, material nonpublic information relating to the purchase, sale or exchange.

Definition: “Prediction market contract” is defined in the bill to mean a contract, derivative, financial instrument, or investment that is both of the following:

- (A) Issued, listed on, or offered by a business entity.
- (B) Related to the outcome, occurrence, or nonoccurrence of a future event or events.

Adds to prohibitions that apply to lobbyists: The bill would also amend the list of prohibitions that apply to lobbyists and lobbying firms, to add that the new prohibition above applies to lobbyists and lobbying firms.

SB 1159 (Cabaldon) – Excluding AI from the Definition of “Person” and Related Terms

Short Summary: SB 1159 would provide that, for the purposes of the PRA, and other specified areas of law, the terms “person,” “interested person,” “participant,” “member of the public,” as applicable, and any other similar terms under each area of law referring to those who may engage with governmental agencies, do not include artificial intelligence systems, autonomous agents, robots, or other nonhuman entities, whether physical or digital.

Detailed Summary:

Existing law: The PRA defines “person” to mean an individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, limited liability company, association, committee, and any other organization or group of persons acting in concert.

Exclusions to the definition of “person” and related terms: SB 1159 provides that, for the purposes of the PRA, CPRA, Bagley Keene, the Administrative Procedures Act, the Brown Act, and CEQA, “the terms ‘person,’ ‘interested person,’ ‘participant,’ ‘member of the public,’ as applicable, and any other similar terms under each act referring to those who may engage with governmental agencies, do not include artificial intelligence systems, autonomous agents, robots, or other nonhuman entities, whether physical or digital.

Definition: For purposes of the bill, “artificial intelligence” is defined to mean an engineered or machine-based system that varies in its level of autonomy and that can, for explicit or implicit objectives, infer from the input it receives how to generate outputs that can influence physical or virtual environments.

Clarification needed: Because the definition of “person” under the PRA includes business entities, committees, organizations, and other “nonhuman entities,” amendments are likely needed to ensure that the bill does not inadvertently affect duties and authority under the PRA.

Note: In its current form, SB 1159 does not directly amend the PRA, but amends definitions in the PRA through reference to PRA sections. Amendments are planned to amend the PRA and other areas of code directly.