



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

December 11, 2024

Supervisor Chris Howard
Del Norte County Board of Supervisors
c/o Shayna M. van Hoften, Esq.
Hanson Bridgett LLP
[REDACTED]

Lori Cowan
[REDACTED]

No Action Closure Letter re: FPPC Case No. 2020-00319; Chris Howard; Lori Cowan; Bob Berkowitz

Gentlepersons:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act.¹ This case arises from a sworn complaint regarding the sister city relationship that was formed between Crescent City and Rikuzentakata, Japan. Allegations raised by the complaint included conflict of interest and gift limit issues with respect to paid travel to Japan. The complaint named the two of you and Bob Berkowitz, in your capacities as Del Norte County Supervisors.

Bob Berkowitz is deceased, and this case is being closed without action as to him. Regarding the two of you, investigation found insufficient evidence to support a finding that you violated the Act.

Regarding the July 2019 trip to Rikuzentakata, Japan that Supervisor Howard took with his wife and children, the City of Rikuzentakata paid for some of the expenses for this trip. Concerns about this being a gift limit violation have been disproven. Given the sister city relationship, travel payments that were made by the City of Rikuzentakata for Supervisor Howard were not subject to any gift limit. (See Section 89506 and Regulation 18950, subd. (a), as in effect July 2019.) In some circumstances, the travel payments for Mrs. Howard might have counted as a gift to Supervisor Howard, but not in this case, given the sister city relationship, Mrs. Howard's employment as a local educator, and her receipt of a separate invitation for the trip. Additionally, Supervisor Howard's children stayed with a host family, and the value of this hospitality did not count as a gift to Supervisor Howard because it meets the requirements of one or more gifting exceptions, including the exceptions for home hospitality and reciprocal exchanges. (See Regulations 18942 and 18943, subd. (c)(1), as in effect July 2019. The Howards extended similar hospitality when members of the host family visited the United States.)

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¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000 through 91014. All statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to this source.

Thank you for your attention to this matter. Do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

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cc: Linda Sutter (sworn complainant)