



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

December 17, 2025

Washington County Water District

Email: [REDACTED]

Advisory Letter re FPPC No. 2020-01083; Washington County Water District

Dear Washington County Water District,

The Enforcement Division of the Fair Political Practices Commission (the “Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a sworn complaint alleging that the Washington County Water District (“WCWD”) violated the Act. The Enforcement Division completed its investigation and has decided to close its file on this matter without further action. This case is closed without prejudice.

Section 87300 of the Act requires every state and local agency to develop a Conflict of Interest Code. This Code requires individuals who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose all reportable interests on SEIs.² Individuals required to file SEIs must file within 30 days of assuming office, annually thereafter at the time specified by the Code, and within 30 days of leaving office.³

Additionally, the Act requires local government agencies to review their Conflict of Interest Codes every even-numbered year. If an agency determines that amendments are necessary due to changed circumstances, it must submit an amended Conflict of Interest Code to the code reviewing body within 90 days.⁴ If no change is required, the agency head must submit a written statement to that effect to the code reviewing body no later than October 1 of the same year.⁵

Further, the code reviewing body may issue an order directed to an agency to take appropriate action regarding a conflict of interest code, including an order to make necessary amendments.⁶

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014.

² Section 87302, subd. (b).

³ *Ibid.*

⁴ Section 87306.

⁵ Section 87306.5.

⁶ Section 87304.

The Enforcement Division has completed its investigation and found that the WCWD's code reviewing body for its Conflict of Interest Code is the Nevada County Board of Supervisors. The Nevada County Board of Supervisors has regularly sent biennial notices to WCWD. However, WCWD has not submitted any written statements stating that no changes are needed, nor has it updated the WCWD Conflict of Interest Code since 2010.

As a result, the Enforcement Division has requested that the Nevada County Board of Supervisors, as WCWD's code-reviewing body, issue an order to compel the WCWD to submit an amended conflict of interest code with the applicable changes for review and approval by the Nevada County Board of Supervisors. If the WCWD does not comply in response to the code reviewing body's order, we have requested that the Nevada County Board of Supervisors refer the WCWD to the Enforcement Division.

Regarding the allegations of conflict of interests for the district-wide vote by WCWD customers on rate changes on December 17, 2020, our investigation determined that there was insufficient evidence of a violation of the Act.

If you need guidance regarding your Conflict of Interest Code obligations, please call the Clerk of the Board for the Nevada County Board of Supervisors at 530-265-1480, the Commission's Toll-Free Advice Line at 1-866-275-3772, or visit our website at www.fppc.ca.gov.

Please feel free to contact me at abreron@fppc.ca.gov or (916) 322-5771 with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton
Assistant Chief
Enforcement Division

CC: Sworn Complainant, James Grill jamesgrill76@att.net