



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

April 1, 2026

City of Salinas

Via Email: cclerk@ci.salinas.ca.us

Advisory Letter re City of Salinas; FPPC No. 2024-00649

Dear City of Salinas:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a commission-initiated investigation, which found that the City of Salinas failed to timely file and post a Payment to Agency Report (“Form 801”). The Enforcement Division completed its investigation and has decided to close its file on this matter without prosecution.

Regulation 18944 provides a procedure that state and local government agencies may use to disclose a payment or payments received from a third party that benefits one or more public officials. So long as the following criteria are met, any benefiting employee is not required to report a gift on their Statement of Economic Interests (Form 700):

- Official Agency Business. The payment is used for official agency business.
- Agency Head Controls Use of Payment. The agency head determines and controls the agency’s use of the payment including the selection of the agency official who will use the payment. The agency head may not select himself or herself as the individual who will use the payment unless payment is for an item that provides for general use by agency officials and the agency head is one of those officials who will have access to such use.
- Agency Reports the Payment. The agency reports the payment on a form prescribed by the Commission (Form 801) and maintained by the agency.

The form must be maintained by the agency as a public record pursuant to the provisions of Section 81008(a). Additionally, pursuant to Regulation 18944, for any quarter year period in which payments aggregating to \$2,500.00 or more since the last filing are received by an agency, a local agency must submit a copy of the form(s) or a detailed summary of the information on the form to the filing officer who receives the agency employees’ statements of economic interests, within 30 days after the close of the quarter. The filing officer shall also post a copy of the form or the information in the form on its website, in a prominent fashion within 30 days after the close of any quarter in which the agency receives payments aggregating to \$2,500.00 or more since the last filing or if it does not maintain a website, shall provide a copy of the form to the Commission, which shall post the information on its website.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and 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.

Here, officials for the City of Salinas participated in the Bloomberg Harvard City Leadership program from July 2023 to June 2024. Their participation in the program had been funded by a gift. It is not clear when the payment would have been made, but it is likely to have been around the start of the program. When asked by Enforcement staff, the City stated they were not provided with a detailed breakdown of the payment until May of 2024. Once the City received the breakdown, the Form 801 was filed, and the form was posted on their website. Due to the minimal public harm, the City's cooperation, and the fact that compliance has been achieved, we are closing this matter with this advisory letter.

Although we are closing our file, please be advised of the provisions in the Act and regulations regarding the gift and "payments to agency" rules. Should you have any questions regarding this letter, please contact Jonathan Rivera at (279) 237-5913 or at jrivera@fppc.ca.gov.

Sincerely,

Kendall L.D. Bonebrake

Kendall L.D. Bonebrake
Chief of Enforcement Division