



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

To: Chair Silver and Commissioners Brandt, Ortiz, and Wilson

From: Dave Bainbridge, General Counsel
Brian Lau, Assistant General Counsel

Subject: **Advice Letter Report**

Date: June 26, 2026

The following advice letters have been issued since June 1, 2026, Advice Letter Report. An advice letter included in this report may be noticed for further discussion or consideration at the August 18, 2026, Commission Meeting. Full copies of the FPPC Advice Letters, including those listed below, are available at [the advice search](#).

Conflict of Interest

Rebecca Moon – [A-26-049](#)

Councilmember whose spouse is employed by a large international business that owns 11 parcels in the specific plan area does not have a disqualifying financial interest in two project decisions that will bring residential apartments with density to two separate sites located within 500 feet of the employer's parcels. The facts do not indicate that either project will have a financial effect on the employer's gross revenue, assets, liabilities or expenses meeting the applicable materiality thresholds. Nor do the facts establish a financial effect on the employer's nearby parcels, where the city previously adopted a specific plan for the area allowing residential development of up to 20,000 units; the parcels are separated from the project sites by streets, parking lots, and/or landscaped areas; and traffic concerns are minimized.

Donna Mooney – [A-26-053](#)

Under the Act, Mayor is not prohibited from taking part in governmental decisions regarding a road construction project located 2,980 feet from her residence. For a property interest more than 1,000 feet from the project, it is reasonably foreseeable that the decision will have a material financial effect on the property only if there is clear and convincing evidence of a substantial effect on the property. However, based on the facts provided, there is no clear and convincing evidence that the Mayor's property will be substantially affected by the project because the project's effects on the traffic around the subdivision are anticipated to be limited to morning commute hours, and the project will not affect the Mayor's access to her residence via the subdivision's existing access points or change the traffic patterns within the subdivision.

Greg Gillot – [A-26-059](#)

Generally, the Act prohibits county supervisor from taking part in decisions that have an effect on a tribe's casino property when the supervisor has a mining claim on land located within 500 feet of the casino property unless there is clear and convincing evidence to establish that the decisions would not have any measurable impact on the supervisor's mining claim.

Adam B. Eliason – [A-26-061](#)

The members of a housing trust board, who approve the trust's investment policies, are public officials who manage public investments and, as such, must now file Statements of Economic Interests directly and electronically with the FPPC. Based on the facts provided, the trust manager and the trust treasurer do not meet this definition because they do not have independent authority over investment strategy or allocation of trust money.

Ashley Stottlemeyer – [A-26-063](#)

Committees may use a filing schedule that combines the semi-annual campaign statement with the second pre-election statement for the August 4, 2026, special election for Sutter County. The combined statement will be due on July 23, 2026, covering the period June 21, 2026, through July 18, 2026.

Lobbying

Jennifer McDonald – [I-26-052](#)

Once an organization qualifies as a lobbyist employer, all "other payments to influence" must be reported unless they fall specifically under an exception. Reading Sections 82002 and 82039 together, compensation paid by the lobbyist employer to an individual for the purpose of influencing legislative or administrative action is reportable even if that individual does not qualify as a lobbyist under the Act. Separate invoicing and timekeeping, consistent with the Act's lobbyist employer and lobbying firm accounting requirements, is generally sufficient to allocate compensation between lobbying activity and PUC testimony services. The Act does not require reporting of compensation related to the preparation of written testimony, even if prepared for a public hearing. Payments in connection with administrative testimony in ratemaking proceedings before the PUC, other than payments to a lobbyist or a lobbying firm, must be reported as lump sum payments in Section E. Payments made to a lobbyist or a lobbying firm in connection with PUC ratemaking proceedings must be reported in Part III, Section A or B of Form 634. The lobbying firm's reciprocal reporting on Form 625 should mirror the lobbyist firm employer's characterization of the same payments for the same services.

Section 1090

Joshua Nelson – [A-26-045](#)

Section 1090 prohibits a member of the district's board of directors from taking part in a contract with a snow removal business in which the member receives annual payments for the sale of equipment used in the business. In addition, because alternative sources are available to provide those services to the district, the rule of necessity does not apply to allow the district to enter into a contract with that snow removal business.

Olivia Clark – [I-26-048](#)

Under the Act, to the extent that a board member has a financial interest in a government entity, the board member is only disqualified from taking part in decisions under Regulation

18703(e)(7) if the decisions result in a unique effect on the board member. Generally, Section 1090 prohibits a board member, as well as the board, from entering into a contract in which a board member has a financial interest unless an exception applies. The Commission has determined that independent contractors for a government entity are within the scope of the exceptions provided for in Sections 1091(b)(13) and 1091.5(a)(9). As a result, Section 1090 generally does not prohibit a contract between two government entities in which an official serves as a board member for one entity and is employed by the other as an independent contractor.