



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
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**To:** Chair Silver and Commissioners Brandt, Ortiz, and Wilson

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

**Subject:** **Advice Letter Report**

**Date:** March 27, 2026

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The following advice letters have been issued since February 27, 2026, Advice Letter Report. An advice letter included in this report may be noticed for further discussion or consideration at the April 16, 2026, Commission Meeting. Full copies of the FPPC Advice Letters, including those listed below, are available at [the advice search](#).

### **Conflict of Interest**

#### **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.

**Gifts****Steve Mattas – [A-25-162](#)**

Based on the facts provided, payments for meals and beverages by a source introduced to the councilmember by the city attorney and made while engaged in informal discussions involving the source's developable property were not based on a social relationship. Thus, the payments are gifts that do not meet any exception and are reportable for the calendar year in which the gifts reached a value of \$50 from the source. However, to the extent that the gifts were made over 12 months prior to the decision before the councilmember and no further gifts are made, the councilmember does not have a disqualifying interest in subsequent decisions that may have a financial effect on the source of the gifts.

**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.

**Section 1090****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.