



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 1, 2026

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

Campaign

Gurkamal Basra – [A-26-026](#)

A candidate for county superior court judge is not a “candidate for an elective state office” for purposes of the campaign contribution limits set forth in Section 85301(a) of the Act. Nor do the state “default” contribution limits imposed by Section 85301(d) apply to a judicial candidate. However, questions regarding the application of a county ordinance and county campaign contribution limits to candidates for county superior court judge should be made to the county.

Conflict of Interest

Zach Heinselmann – [A-26-015](#)

City councilmember has a disqualifying financial interest in specific plan decision where it applies to a parcel owned by a business “otherwise related to” a business that employs the official. Because the parcel is explicitly involved in the decision, it is reasonably foreseeable that the decision will have a material financial effect on the councilmember’s interest in his employer. The councilmember also has a disqualifying financial interest in decisions regarding an entertainment zone and related depot lawn, which would permit alcohol sales and consumption in designated areas. Because only five businesses are affected by the change in permitted alcohol sales, the entertainment zone decision is an action directed at the otherwise related business entity and the underlying use of its property. Accordingly, it is reasonably foreseeable that the decision will have a material financial effect on the councilmember’s interest in the business. Additionally, the depot lawn decisions are “inextricably interrelated” to the entertainment zone decision because the result of one decision will effectively determine, affirm, nullify, or alter the result of another decision. The mayor pro tem also has a disqualifying financial interest in the decisions. Because the mayor pro tem owns residential property within the specific plan area and within 360 feet from the entertainment zone, the official may not take part in the decisions because the specific plan decisions may alter the development plans or criteria applicable to the property, and the official has not established with clear and convincing

evidence that the entertainment zone and related lawn depot decisions would have no measurable impact on his financial interest.

Section 1090

Kevin Briggs – [A-26-009](#)

Under the Act, a county supervisor has a disqualifying financial interest and may not take part in county decisions to hire, or pay for services from, her spouse's refrigerator and freezer repair service business. The business is explicitly involved in the decisions, and it is reasonably foreseeable that the decisions will have a material financial effect on the business. Under Section 1090, the county is not prohibited from retaining the repair services where the county purchasing agent and assistant purchasing agents have independent statutory authority to hire for services within their purchasing authority, and the county auditor has authority to pay without Board action. However, other state laws outside the Commission's authority may otherwise prohibit payment for these services.

Timothy J. Carmel – [I-26-011](#)

Under the Act, a sanitation district board member is not generally prohibited from taking part in decisions regarding the county in which he is employed merely because he receives a government salary from the county, which is not "income" as defined in the Act. Under Section 1090, the board member is generally prohibited from making or participating in the making of a contract in which he has a financial interest, unless an exception applies.

Nira F. Doherty – [A-26-032](#)

Section 1090 does not prohibit a city manager from contracting on behalf of the city with a nonprofit organization that employed a city council member, as long as the city council members completely refrained from taking part in the contract, because the city manager was an independent officer who had the authority to enter into such contracts under the city's local ordinance.