



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

July 20, 2026

Julia M. Lew
McCormick Kabot & Lew
4010 South Demaree St.
Visalia, CA 93277

Re: Your Request for Advice
Our File No. A-26-027

Dear Ms. Lew:

This letter responds to your request for advice on behalf of City of Exeter (“City”) Mayor Pro Tempore Jeff Wilson and Council Member Frankie Alves regarding the conflict of interest provisions of the Political Reform Act (the “Act”) and Government Code Section 1090, *et seq.*¹ Please note that we are only providing advice under the Act and Section 1090, not under other general conflict of interest prohibitions such as common law conflict of interest.

Also, note that we are not a finder of fact when rendering advice (*In re Oglesby* (1975) 1 FPPC Ops. 71), and any advice we provide assumes your facts are complete and accurate. If this is not the case or if the facts underlying these decisions should change, you should contact us for additional advice. Further, the Commission is not authorized and does not provide advice concerning past conduct. (Regulation 18329(b)(6)(A).) Therefore, nothing in this letter should be construed to evaluate any conduct that may have already taken place, and any conclusions contained in this letter apply only to future actions.

We are required to forward your request regarding Section 1090 and all pertinent facts relating to the request to the Attorney General’s Office and the Tulare County District Attorney’s Office, which we have done. (Section 1097.1(c)(3).) We did not receive a written response from either entity. (Section 1097.1(c)(4).) We are also required to advise you that, for purposes of Section 1090, the following advice “is not admissible in a criminal proceeding against any individual other than the requestor.” (See Section 1097.1(c)(5).)

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

QUESTIONS

1. Under the Act and Section 1090, may Mayor Pro Tem Wilson take part in decisions involving requests for funding or the provision of City services related to special events from the Exeter Chamber of Commerce (“Chamber”), given that his wife serves as a non-compensated officer on the Chamber’s Board of Directors (“Board”)?
2. Under the Act and Section 1090, may Council Member Alves take part in decisions involving requests for funding or the provision of City services related to special events from the Chamber, given that his mother, Kristy McGill, serves as a non-compensated officer on the Chamber’s Board and has a local business (the “Business”), which is a member of the Chamber, and Council Member Alves’ wife is a paid employee of the Business?

CONCLUSIONS

1. Yes, to the extent that Mayor Pro Tem Wilson has no other financial interest in the potential decisions and the decisions will not in any way affect his personal finances, the Act’s conflict of interest provisions would not prohibit him from taking part in the decisions at issue here. As to Section 1090, because Mayor Pro Tem Wilson’s wife does not receive income from the Chamber for her services on the Chamber Board, and Mayor Pro Tem Wilson has no other financial interest in the Chamber, the noninterest exception under Section 1091.5(a)(8) applies and he is not disqualified from taking part in the decisions at issue here. However, Mayor Pro Tem Wilson must ensure that his interest in the Chamber is noted in the City’s official records.²
2. While the facts do not identify an actual decision before the City Council to determine whether Council Member Alves is disqualified from taking part in a particular decision under the Act, we can generally advise that the Act would not prohibit Council Member Alves from taking part in the potential decisions provided the decisions will not in any way have a material financial effect on Kristy McGill or the Business. For purposes of Section 1090, it appears Council Member Alves does not have a financial interest in the potential contracts at issue here as neither Kristy McGill nor the Business are parties to

² Note that the Commission does not provide advice relating to past conduct. Thus, we express no opinion on Mayor Pro Tem Wilson’s or Council Member Alves’ involvement in any previous decisions related to the Chamber, including two separate approvals for temporary street closures and accompanying minor special event fee waiver requests (\$171) that are routinely granted to all nonprofit-sponsored special events requiring a City permit.

the potential contracts. As a result, Council Member Alves is generally not prohibited from taking part in the potential contracts.³

FACTS AS PRESENTED BY REQUESTER

Mayor Pro Tem Wilson was elected to the City Council on November 5, 2024. Mayor Pro Tem Wilson's wife, Sherri Wilson, was appointed to the Chamber Board in December 2025 and does not receive any compensation for her service.

Council Member Alves was first appointed to the City Council in August of 2018 and was elected to the City Council in November of 2022. Council Member Alves' mother, Kristy McGill, was appointed to the Chamber Board in December 2025 and does not receive any compensation for her service. Council Member Alves assists Kristy McGill with the Business, a Chamber member, without pay, and his wife is a paid employee of the Business who will receive more than \$1,000 within 12 months before the decisions at issue here. Kristy McGill is the sole owner of the Business.

The Chamber is a 501(c)(6) nonprofit, tax-exempt corporation. The City and the Chamber have a long history of serving and supporting one another. Until 2015, for many years the City contributed a substantial annual amount ranging from \$16,000 to \$42,000 to the Chamber, including a line item in its budget. The City eliminated the budgetary line item for any standing annual amount for fiscal reasons but continues to consider and has routinely approved monetary support and resource assistance for a majority of the Chamber's community special events and projects such as the annual Fall Festival, the Christmas Parade and Holiday downtown open house events, annual awards dinner, and Farmers Market. Overall, from 2010 to present, the City has contributed \$250,212.50 to the Chamber in donations, sponsorships, investments and dues, and also routinely waives event application fees given the entities' shared purposes and community benefit.

The Chamber's mission is to "Promote, support, and Enable Exeter to Prosper." The Chamber's primary objective is to advance the economic health and overall well-being of the City by advocating for and initiating projects that benefit the City as a whole. In addition to working to build a strong local economy with efforts in recruiting, retaining and strengthening businesses in the City limits, it also promotes the community to residents and visitors through its marketing, events and annual community guide. The Chamber even has a historical significance

³ We caution that this conclusion is limited to the conflict of interest provisions of the Act and Section 1090. The Commission cannot provide advice regarding the common law conflict of interest provisions. Accordingly, we express no opinion regarding the potential application of common law conflict of interest provisions. See 92 Ops. Cal. Atty. Gen. 19 for a discussion of the common law doctrine against conflicts of interest where there may be a temptation to act for personal or private reasons rather than in the public interest.

to the City – before the City’s incorporation, the predecessor to the Chamber (the “Board of Trade”) advocated and assisted with the formation of compacted dirt roadways and the provision of a community water system.

The City is a small, close-knit city with an estimated population of 10,186. The purposes and functions of the City Council include setting policy direction for the City, adopting the budget, and ensuring the City remains safe, fiscally solvent, and an attractive community to live, work, and visit. To that end, the City Council initiated, and the City’s residents adopted, a general sales tax (transactions and use tax) measure in 2020. As a small city, the City does not have a formal Community Development Department (or an Economic Development Department), instead relying on the City Administrator, the Planning Commission, and a Planning Consultant for its planning functions. Given the City’s size and budget, direct economic development activities by the City are (and always have been) limited. Consequently, the Chamber fills a crucial role in the City’s community vitalization and durability goals, and the Chamber’s efforts go hand in hand with the City’s responsibilities. The Chamber’s promotional role in producing the community guide and visitor materials, supporting local businesses, and coordinating signature events to draw outside spending into the City, directly contributes to the growth of the City’s tax base, enabling the City to meet its objectives and to better fund public safety, streets, and parks.

ANALYSIS

The Act

Section 87100 of the Act prohibits a public official from making, participating in making, or in any way attempting to use the official’s position to influence a government decision in which the official has a financial interest.

A public official disqualified from a governmental decision based on a conflict of interest is not merely prohibited from voting on the item. The official is also prohibited from making, participating in making, or in any way attempting to use their official position to influence the governmental decision in which they know or have reason to know they have a financial interest. (Section 87100.) Regulation 18704 defines “making, participating in making, and attempting to use their position to influence” a governmental decision as follows:

- *Making a Decision:* A public official makes a governmental decision if the official authorizes or directs any action, votes, appoints a person, obligates or commits the official’s agency to any course of action, or enters into any contractual agreement on behalf of the official’s agency. (Regulation 18704(a).)

- *Participating in a Decision:* A public official participates in a governmental decision if the official provides information, an opinion, or a recommendation for the purpose of affecting the decision without significant intervening substantive review. (Regulation 18704(b).)
- *Using Official Position to Attempt to Influence a Decision.* A public official uses an official position to influence a governmental decision if the official: contacts or appears before any official in the official's agency or in an agency subject to the authority or budgetary control of the official's agency for the purpose of affecting a decision; or contacts or appears before any official in any other government agency for the purpose of affecting a decision, and the public official acts or purports to act within the official's authority or on behalf of the official's agency in making the contact. (Regulation 18704(c)(1)-(2).)

Financial Interests

A public official has a financial interest in a decision within the meaning of Section 87100 if it is reasonably foreseeable that the decision will have a material financial effect, distinguishable from its effect on the public generally, on an interest specified in Section 87103, including:

- Any business entity⁴ in which the public official has a direct or indirect investment worth \$2,000 or more (Section 87103(a)) and any business entity in which the public official is a director, officer, partner, trustee, employee, or holds any position of management. (Section 87103(d).)
- Any real property in which the public official has a direct or indirect interest worth \$2,000 or more. (Section 87103(b).)
- Any source of income aggregating \$500 or more in value provided or promised to, received by, the public official within 12 months prior to the time when the decision is made. (Section 87103(c).)
- Any donor of, or any intermediary or agent for a donor of, a gift or gifts aggregating \$630 or more in value provided to, received by, or promised to the public official within 12 months prior to the time when the decision is made. (Section 87103(e) and Regulation 18940.2.)

⁴ The Act defines "business entity" to mean any organization or enterprise operated for profit. (Section 82005.)

- An interest in the official's personal finances and those of the official's immediate family.⁵ (Section 87103.)

For purposes of Section 87103, an “indirect interest” includes any interest owned by the spouse of a public official. (Section 87103.) In addition to having a source of income financial interest in any business entity from which the official has received income of \$500 or more within 12 months before the relevant governmental decision is made, the official has a source of income financial interest in any individual owning a 50 percent or greater interest in that business entity; and any individual, regardless of the individual's ownership interest in that entity, who has the power to direct or cause the direction of the management and policies of the business entity. (Regulation 18700.1(a)(2)(A)-(B).)

Mayor Pro Tem Wilson's Financial Interests

Based on facts presented, Mayor Pro Tem Wilson's wife, Sherri Wilson, serves on the Chamber Board and does not receive any compensation for her service. As such, Mayor Pro Tem Wilson does not have a source of income interest or an interest in a business entity under the Act.⁶ Additionally, an official always has an interest in their personal finances. (See Section 87103.) No other financial interests were identified, and no facts were presented regarding Mayor Pro Tem Wilson's personal finances or any decisions that may in any way affect his personal finances. Accordingly, to the extent that Mayor Pro Tem Wilson has no other financial interest in the potential decisions and the decisions will not in any way affect his personal finances, the Act's conflict of interest provisions would not prohibit him from taking part in decisions related to requests from the Chamber for funding or the provision of City services related to special events.

Council Member Alves' Financial Interests

Based on facts presented, Council Member Alves' mother, Kristy McGill, serves on the Chamber Board and does not receive any compensation for her service. Additionally, Council Member Alves assists Kristy McGill with the Business in which she is the sole owner, without pay, and his wife is a paid employee of the Business who will receive more than \$1,000 within the 12 months before the decisions at issue here. As such, pursuant Section 87103(c), Council Member Alves has an indirect source of income financial interest in the Business since his wife will receive more than \$1,000 from the Business within the 12 months before the relevant

⁵ The Act defines “immediate family” to mean the spouse and dependent children. (Section 82029.)

⁶ Mayor Pro Tem Wilson will not have a business interest in the Chamber because, as a nonprofit organization, it is not a “business entity” as defined by the Act. (See Section 82005.)

decisions. Additionally, pursuant to Regulation 18700.1(a)(2), Council Member Alves has an indirect source of income financial interest in his mother, Kristy McGill, since she is the sole owner of the Business. Finally, Council Member Alves has a financial interest in his personal finances and those of his immediate family.⁷

Foreseeability and Materiality

For a conflict of interest to exist, it must be reasonably foreseeable that the governmental decision would have a material financial effect⁸ on the public official's financial interests. (Regulation 18700(d)(1)-(2).)

Regulation 18701(a), which provides the applicable standard for determining the foreseeability of a financial effect on a financial interest explicitly involved in a governmental decision, states:

A financial effect on a financial interest is presumed to be reasonably foreseeable if the financial interest is a named party in, or the subject of, a governmental decision before the official or the official's agency. A financial interest is the subject of a proceeding if the decision involves the issuance, renewal, approval, denial or revocation of any license, permit, or other entitlement to, or contract with, the financial interest, and includes any governmental decision affecting a real property financial interest as described in Regulation 18702.2(a)(1)-(6).

Where, as the facts indicate here, an official's financial interest is not explicitly involved in a decision, the applicable standard for determining the foreseeability of a financial effect on a financial interest is found in Regulation 18701(b), which provides:

A financial effect need not be likely to be considered reasonably foreseeable. In general, if the financial effect can be recognized as a realistic possibility and more than hypothetical or theoretical, it is reasonably foreseeable. If the financial result cannot be expected absent extraordinary circumstances not subject to the public official's control, it is not reasonably foreseeable.

⁷ If the decision would have a reasonably foreseeable financial effect on the official's financial interest in a business entity, any related effect on the official's personal finances is not considered separately. (Regulation 18702.5(c).)

⁸ "Financial effect" means an effect that provides a benefit of monetary value or provides, prevents, or avoids a detriment of monetary value. (Regulation 18700(c)(5).)

Council Member Alves' Financial Interests in Business Entity and Source of Income

As noted above, Council Member Alves has an indirect source of income financial interest in the Business and Kristy McGill due to his wife's paid employment with the Business and Kristy McGill's ownership interest in the Business. Thus, Council Member Alves is disqualified from taking part in any governmental decisions in which it is reasonably foreseeable that the decisions would have a material financial effect on the Business or Kristy McGill.

Regulation 18702.3 outlines when a financial effect of a governmental decision on a source of income is material. Relevant to these facts, the reasonably foreseeable financial effect of a governmental decision is material if the source is an individual and the official knows that the individual has an interest in a business entity, or the source is a business entity, that will be financially affected under the materiality standards in Regulation 18702.1. (Regulations 18702.3(a)(2)(B) and 18702.3(a)(4).)

Regulation 18702.1 provides that the reasonably foreseeable financial effect of a governmental decision on a business entity not explicitly involved is material if:

- The decision may result in an increase or decrease of the entity's annual gross revenues, or the value of the entity's assets or liabilities, in an amount equal to or more than \$1,000,000, or five percent of the entity's gross revenues and the increase or decrease is at least \$10,000. (Regulation 18702.1(a)(2).)
- The decision may cause the entity to incur or avoid additional expenses or to reduce or eliminate expenses in an amount equal to or more than \$250,000, or one percent of the entity's annual gross revenues and the change in expenses is at least \$2,500. (Regulation 18702.1(a)(3).)
- The official knows or has reason to know that the entity has an interest in real property and the property is a named party in, or the subject of, the decision, or there is clear and convincing evidence the decision would have a substantial effect on the property. (Regulation 18702.1(a)(4).)

In addition to the materiality standards for a source of income as described above, there is a special rule for materiality that applies in cases where there is a "nexus" between duties owed to a source of income and to the official's public agency. When another entity pays a public official to accomplish some action that is within the official's public decision-making authority, any financial effect on the source of income is presumed material. Regulation 18702.3(b) sets forth the "nexus test" which provides:

Any reasonably foreseeable financial effect on a source of income to a public official or the official's spouse is material if the decision will achieve, defeat, aid, or hinder a purpose or goal of the source and the official or the official's spouse receives or is promised the income for achieving the purpose or goal.

The rationale for the nexus test is that when an employee earns a salary to accomplish a purpose that may be advanced by what they do as a public official, we presume that the private employer is benefiting from the actions of the employee in their official capacity. (*Garza* Advice Letter, No. A-17-207; *Tran* Advice Letter, No. A-16-024; *Maltbie* Advice Letter, No. A-15-243.) Typically, a "nexus" is found in situations where the official is also a high-level employee with direct influence and control over their employer's management or policy decisions. (*Tran* Advice Letter, *supra*; *Moser* Advice Letter, No. A-03-147; *Low* Advice Letter, No. A-99-305.)

Based on the limited facts provided, it appears the potential decisions involving requests for funding or the provision of City services related to special events from the Chamber would not meet the thresholds provided in Regulation 18702.1 to have a material financial effect on the Business or Kristy McGill. Additionally, there are no facts to suggest that the nexus test would apply here as Council Member Alves' wife is a paid employee of the Business and is not paid to achieve a particular purpose or goal.

While you have not identified an actual decision before the City Council, it appears the Act would not generally prohibit Council Member Alves from taking part in the decisions at issue here provided the decisions will not have a material financial effect on the Business or Kristy McGill, including any real property in which the Business may have an interest. However, Council Member Alves must consider each decision separately and determine whether the decision may have a material financial effect on the Business or Kristy McGill based on the thresholds provided in Regulation 18702.1, outlined above.

Section 1090

Section 1090 generally prohibits public officials, while acting in their official capacities, from making contracts in which they are financially interested. Section 1090 is concerned with any financial interests, other than perhaps a remote or minimal interest, which would prevent the official involved from exercising absolute loyalty and undivided allegiance in furthering the best interests of their respective agencies. (*Stigall v. Taft* (1962) 58 Cal.2d 565, 569.) When Section 1090 is applicable to one member of a governing body of a public entity, the prohibition cannot be avoided by having the interested board member abstain; the entire governing body is precluded from entering into the contract. (*Thomson v. Call* (1985) 38 Cal.3d 633, 649.)

Section 1090 does not specifically define the term "financial interest," case law and Attorney General opinions state that prohibited financial interests may be indirect as well as

direct, and may involve financial losses, or the possibility of losses, as well as the prospect of pecuniary gain. (*Thomson v. Call*, supra, at pp. 645, 651-652; see also *People v. Vallerga* (1977) 67 Cal.App.3d 847, 867, fn. 5; 85 Ops.Cal.Atty.Gen. 34, 36-38 (2002); 84 Ops.Cal.Atty.Gen. 158, 161-162 (2001).) As a general rule, a member of a board or commission always has a financial interest in their spouse's source of income for purposes of Section 1090. (See, e.g., 78 Ops.Cal.Atty.Gen. 230, 237 (1995); *Craft* Advice Letter, A-14-168.) But note, since the spouse's source of income is attributed to the official, exemptions that would be applicable if the official possessed the interest directly also apply to the spouse's source of income. (81 Ops.Cal.Atty.Gen. 169 (1998).)

For purposes of Section 1090, Mayor Pro Tem Wilson and Council Member Alves have a financial interest in any contract that financially benefits their respective spouses under community property laws, and they will be considered to be participating in the making of any contracts as members of the City Council. (See *Thorpe v. Long Beach Cmty. College Dist.*, (2000) 83 Cal.App.4th 655, 659; 81 Ops.Cal.Atty.Gen. 327, 328 (1998).)

Section 1090 applies to any grants the city council wishes to make to a non-profit corporation. (See *People v. Honig* (1996) 48 Cal.App.4th 289 [rejecting a claim that a grant was not a contract within the meaning of section 1090] and 85 Ops.Cal.Atty.Gen. 176 (2002).) However, the Legislature has created various statutory exceptions to the Section 1090 prohibition where the financial interest involved is deemed to be a "remote interest," as defined in Section 1091, or a "noninterest," as defined in Section 1091.5. Noninterests under Section 1091.5 are "interests that, while technically within the scope of the financial interests covered by section 1090, as a practical matter do not raise the sorts of conflict of interest problems with which section 1090 is concerned and thus are statutorily excluded from its purview." (*Lexin v. Superior Ct.* (2010) 47 Cal. 4th 1050, 1073-74.) If a "noninterest" is present, as defined in Section 1091.5, the contract may be made without the officer's abstention, and generally, a noninterest does not require disclosure. (See Section 1091.5.)

Mayor Pro Tem Wilson

Sherri Wilson, Mayor Pro Tem Wilson's wife, serves on the Chamber's Board and is not compensated for her service on the Chamber Board.

Section 1091.5(a)(8) provides that an officer shall not be deemed to be interested in a contract where the officer's interest is that of a non-compensated officer of a non-profit, tax exempt corporation, which, as one of its primary purposes, supports the functions of the body or board or to which the body or board has a legal obligation to give particular consideration, and provided further that this interest is noted in its official records.

The Chamber is a 501(c)(6) nonprofit, tax-exempt corporation. The facts provided state that the Chamber's primary purpose is to advance the economic health and overall well-being of

the City by advocating for and initiating projects that benefit the City as a whole. In addition to working to build a strong local economy with efforts in recruiting, retaining and strengthening businesses in the City limits, the Chamber also promotes the community to residents and visitors through its marketing, events, and annual community guide. The City also has an interest in achieving this purpose as it has a general interest in ensuring the City remains safe, fiscally solvent, and an attractive community to live, work, and visit.

Accordingly, the Chamber's primary purpose supports the functions of the City and Mayor Pro Tem Wilson has a "noninterest" in the Chamber as Sherri Wilson is an uncompensated officer of the organization. Thus, as long as Mayor Pro Tem Wilson's interest is noted in the City Council's official records, and he does not have any other economic interests involved, Section 1090 does not prohibit him from taking part in decisions involving the Chamber.

Council Member Alves

Kristy McGill, Council Member Alves' mother, serves on the Chamber's Board and is not compensated for her service on the Chamber Board. The Business is a member of the Chamber. Council Member Alves assists Kristy McGill with the Business, without pay, and his wife is a paid employee of the Business.

Past Attorney General Opinions have found that absent a financial relationship between adult relatives (such as a legal obligation to support an adult child, a parent's incapacity, or a shared ownership interest) the officer does not have a "financial interest" under Section 1090 when the contract involves an official's adult relative. In 92 Ops.Cal.Atty.Gen. 19 (2009), the Attorney General analyzed whether a redevelopment agency board member had a conflict of interest if the agency entered into a loan agreement with the board member's adult son who resided with the board member but was not her dependent. In the portion of the opinion analyzing Section 1090, it was noted that, under Section 1091(b)(4), an official has a "remote interest" in the earnings of his or her minor child, but the Section 1090 statutory scheme makes no reference to interests in an adult child. Further, the opinion stated that there was no evidence the board member would profit from the loan transaction. Consequently, the opinion concluded that the board member had no financial interest in the contract and thus had no conflict of interest under Section 1090, stating: "[a] parent is not legally compelled to support an adult child absent special circumstances not present here, such as the child's incapacity. Conversely, an adult child has no legal duty to support a parent, unless the parent is "in need and unable to support himself or herself by work," a circumstance also not present here. [Footnotes omitted.] (See also 28 Ops.Cal.Atty.Gen. 168, 169 (1956) [family relationship between county supervisor and his adult brother did not result in a violation of Section 1090 where the brother sold automobiles to the county but there was not a proprietary interest or entitlement for contribution or support between the adult brothers].)

Under the facts considered in the opinion, the official's son was an adult, not a dependent of the official and, even though he lived with the official, had no apparent financial relationship with the official. Here, the relationship at issue is similarly remote as the facts suggest Council Member Alves' mother, Kristy McGill, is not dependent on him, financially or otherwise. Therefore, for purposes of Section 1090, Council Member Alves does not have a financial interest in Kristy McGill based on his familial relationship. However, Council Member Alves does have a financial interest in Kristy McGill and the Business, indirectly through his wife's paid employment with the Business.

We can provide specific advice related to Section 1090 only if an actual contract is identified along with the factual circumstances pertaining to the decisions related to the contract. Generally, we can advise that Section 1090 prohibits Council Member Alves, as well as the City Council, from entering a contract in which Council Member Alves has a financial interest, unless an exception applies.

Based on the limited facts presented, it appears neither the Business nor Kristy McGill are parties to the potential contracts at issue here. Additionally, there are no facts to suggest that the grants to the Chamber considered here would in any way financially benefit, or affect, the Business or Kristy McGill. Therefore, for purposes of Section 1090, Council Member Alves does not have a financial interest in the potential contracts at issue here related to his indirect financial interest in the Business and Kristy McGill that would prohibit him from taking part in the decisions.

Accordingly, based on these facts, Council Member Alves does not have a financial interest in the contracts at issue here for purposes of Section 1090 and is thus not prohibited from taking part in the City Council decisions for requests for funding or the provision of City services related to special events from the Chamber.

If you have other questions on this matter, please contact me at JRinehart@fppc.ca.gov.

Sincerely,

Dave Bainbridge
General Counsel

JennaRinehart

By: Jenna C. Rinehart
Senior Counsel, Legal Division

JR:aja