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

August 14, 2026

Fred Money
512 Sutherland Ranch Lane
Roseville, CA 95678

Re: Your Request for Informal Assistance
Our File No. I-26-042

Dear Mr. Money:

This letter responds to your request for advice regarding the post-governmental employment provisions of the Political Reform Act (the "Act").[1] Please note that we are only providing advice under the post-governmental employment provisions of the Act and not under other general conflict of interest prohibitions such as common law conflict of interest or Section 1090. Because your questions are general in nature and not limited to a specific proceeding, we are treating your request as one for informal assistance.[2]

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. Finally, the Commission is not authorized to, 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 prospective actions.

QUESTIONS

1. Does the Act's one-year ban prohibit you from consulting for the Anti-Recidivism Coalition (the "ARC") to advise on the State's Conservation Camp Program (the "Program") and assist with rehabilitation efforts for compensation?

2. Does the Act's permanent ban prohibit you from consulting with the ARC on the requirements of the Program or assisting the ARC with their rehabilitative efforts within the California Department of Corrections and Rehabilitation ("CDCR") facilities and

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[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.

[2] Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

Conservation Camps, where you were Camp Liaison Captain at CDCR and responsible for the oversight and operation of the Program?

3. Does the Act's one-year ban prohibit you from consulting with State legislators on legislation related to the Program if you are also employed as a consultant?

4. Does the Act's permanent ban prohibit you from consulting with State legislators on legislation related to the Program if you are employed as a consultant and you provided subject-matter expertise on the implementation of legislation and regulations related to the Program in your role at CDCR?

CONCLUSIONS

1. No, generally the one-year ban does not prohibit you from being compensated to consult on the Program and assisting the ARC with rehabilitative efforts, so long as you do not appear before or communicate with your former agency, CDCR, for the purpose of influencing a legislative, administrative, or discretionary action which involves the issuance, amendment, awarding, or revocation of a permit, license, grant or contract, or the sale or purchase of goods or property until one year after you've left state employment. However, certain actions may be prohibited under the permanent ban as discussed below.

2. The permanent ban generally prohibits you from participating in or advising the ARC on the Program or assisting with the ARC's rehabilitative efforts to the extent the work relates to Amity's contract, because you participated in the contract by rendering advice on a substantial basis. If you have questions about specific aspects of the work you would like to do on behalf of the ARC, you should seek additional advice, more fully describing the work the ARC performed under the contract, the specific work you would like to do on behalf of the ARC, and any relationship that work has to the contract you previously advised on.

3. No, the one-year ban does not generally apply to a communication limited to a State legislature. The one-year ban only prohibits you from making appearances or communications before officials and employees of the CDCR, and agencies under the direction and control of the CDCR, for the purpose of influencing any administrative, legislative, or discretionary action involving the issuance, amendment, award, or revocation of a permit, license, grant or contract, or the sale or purchase of goods or property for one year after leaving employment. We caution that the permanent ban may still prohibit you from making communications or appearances before State legislators related to a "proceeding" involving specific parties if you previously participated in the "proceeding" during your employment with CDCR, including but not limited to Amity's contract with the CDCR.

4. The permanent ban generally does not prohibit you from working on legislation involving general statutes, but legislation that relates to a "special statute" that applies to a particular person, place, or interest may be a "proceeding" under the Act. You should seek further advice if you have questions about specific legislation.

FACTS AS PRESENTED BY REQUESTER

You retired from the CDCR on November 8, 2025. Your final position was Camp Liaison Captain, and you oversaw the entire Program. According to the CDCR website, the Program is a collaborative effort between CDCR, the California Department of Forestry and Fire Protection ("CAL FIRE"), and the Los Angeles Fire Department, where participants support local, state, and federal government agencies in response to emergencies such as fire, floods, and other disasters.[3] The 35 Conservation Camps in the Program are under CDCR jurisdiction and are minimum-security facilities.[4] While you oversaw the operations of the Program as a whole, Northern and Southern Captains oversaw the day-to-day operations and staffing at the individual Conservation Camps within each region. You worked under the direction of CDCR leadership, including direct supervision by the Associate Warden and the Associate Director. As Camp Liaison Captain, you filed an annual Statement of Economic Interest. You were considered a subject-matter expert. Now you are interested in working to enhance the Program in roles outside of CDCR.

Your responsibilities included overseeing and coordinating the Program's operations in collaboration with CAL FIRE administration to ensure compliance with applicable state correctional and firefighting standards. You worked directly with CAL FIRE on matters involving camp operations, incarcerated firefighter training, equipment, food services, and compliance with established wildland firefighting requirements. You participated in management reviews and audits of Conservation Camps to ensure adherence to both correctional and fire service standards. As a liaison, you coordinated with CDCR and external stakeholders, including CAL FIRE, the Los Angeles Fire Department, courts, District Attorney's offices, sheriff's departments, and other partner agencies such as the Office of Youth and Community Restoration, and with the California Correctional Peace Officers Association on labor-related matters affecting the Camps. You provided information to internal CDCR leadership, external agencies, and the media regarding the Program. You wrote and developed the Youth Offender Pilot Program (the "YOP Program"), which was eventually adopted into state law.

Additionally, you provided subject-matter expertise on the Program to those responsible for creating policies and regulations, including those related to new legislation and pilot initiatives such as the YOP Program. For example, you recommended that CDCR leadership consider splitting the counseling resources provided through an existing contract with Amity to bring some of those resources to the Growlersburg Conservation Camp as the YOP Program expanded there. You were aware that Amity partnered with ARC to provide services to youth at the Pine Grove Conservation Camp, Amity had a contract with CDCR, and the types of services provided.

Now you seek to serve as a consultant to the ARC, which provides services such as rides home, union cohort training, and housing. The ARC operates across all CDCR facilities and

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[3] California Department of Corrections and Rehabilitation, *Frequently Asked Questions: Conservation (Fire) Camp Program,* https://www.cdcr.ca.gov/facility-locator/conservation-camps/faq-conservation-fire-camp-program/, (last viewed, July 23, 2026.).

[4] *Id.*

institutions. It has specific connections to the Program at the Ventura Training Center, Growlersburg Conservation Camp, and Pine Grove Youth Conservation Camp, where the ARC provides life skills and coaching to incarcerated individuals. The services the ARC provides include case management and mentorship to guide individuals through reentry challenges, trauma-informed counseling and mental health support, housing assistance, and education and job training programs. The ARC began working in CDCR facilities before you became Camp Liaison Captain in 2021.

As a consultant to the ARC, you would advise on ways to serve incarcerated firefighters better and build a support network to help them seek employment with CAL FIRE, the Federal Hotshots, or other firefighting organizations upon their release. Your work would focus on developing better services and outreach to incarcerated populations, including education in both county jails and state prisons on the ARC's services and how to better break the potential for recidivism. You clarified that your role would include educating incarcerated individuals about the Program's eligibility requirements and assisting with rehabilitative efforts.

Also, you were contacted by several State legislators seeking consultation on legislation to benefit the Program. You have asked whether you may consult with legislators to provide subject-matter expertise related to the Program.[5,6]

ANALYSIS

The Act

Public officials who leave state service are subject to two types of post-governmental employment provisions under the Act: the "one-year ban" and the "permanent ban." These provisions are commonly referred to as the "revolving door" prohibitions.

The One-Year Ban

The one-year ban applies to any employee, officer, or consultant of a state administrative agency who holds a position designated or should be designated in the agency's conflict-of-interest code and prohibits the employee from "making any formal or informal appearance" or "any oral or written communication, before any state administrative agency, or officer or employee thereof, for which the individual worked or represented… ." (Section 87406(d)(1).) The "one-year ban" prohibits a former state employee or consultant from, for compensation, making any formal or informal appearance or any oral or written communication before the

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[5] You also sought advice as to whether the one-year or permanent ban would prohibit you from consulting with the Future Fire Academy ("the" FFA). You have already left CDCR and consulted with the FFA for compensation on matters pertaining to the Program. Thus, we are unable to opine on the application of a one-year or permanent ban with respect to the FFA, as the Commission cannot advise on past conduct. (Regulation 18329(b)(6)(A).)

[6] Immediately following your retirement and prior to being approached to consult by any entity, you connected CDCR personnel with the FFA to make introductions, but you have not made any appearances or communications with CDCR regarding the Program since you were asked to consult.

former official's agency, or an officer or employee of the former official's agency, for the purpose of influencing any administrative, legislative, or discretionary act involving the issuance, amendment, awarding, or revocation of a permit, license, grant, or contract, or the sale or purchase of goods or property. (Section 87406; Regulation 18746.1.) The ban applies for 12 months after the employee permanently leaves employment. While in effect, the one-year ban applies only when a former employee, official, or consultant is compensated for their appearances or communications before their former agency on behalf of any person as an agent, attorney, or representative of that person. (Regulation 18746.1(b)(3) and (4).)

In contrast to the permanent ban, which only applies to proceedings involving specific parties, such as "judicial or quasi-judicial" proceedings, the one-year ban applies to any appearance or communication made to influence "a legislative or administrative action, or any discretionary action involving the issuance, amendment, awarding, or revocation of a permit, license, grant, or contract, or the sale or purchase of goods or property." (Regulation 18746.1(b)(5)(C).) An appearance or communication is for the "purpose of influencing" if it is made for the "principal purpose of supporting, promoting, influencing, modifying, opposing, delaying, or advancing the action or proceeding." (Regulation 18746.2.) An appearance or communication includes, but is not limited to, conversing by telephone or in person, corresponding in writing or by electronic transmission, attending a meeting, and delivering or sending any communication. (Regulation 18746.2.)

Appearances and communications are prohibited only if they are: (1) before a state agency that the public official worked for or represented; (2) before a state agency "whose budget, personnel, and other operations are subject to the direction and control" of the state agency the public official worked for or represented; or (3) before any state agency subject to the direction and control of the Governor if the official was a designated employee of the Governor's office during the 12 months before leaving employment. (Regulation 18746.1(b)(6)(C)(i-iii).) We have advised that a former agency official may, without violating the one-year ban, draft proposals on a client's behalf to be submitted to their former agency so long as the former employee is not identified in connection with the client's communications, and such communications are not prohibited under the permanent ban or Section 1090. (See, e.g., *Nichols* Advice Letter, No. I-23-058; *Cook* Advice Letter, No. A-95-321; *Harrison* Advice Letter, No. A-92-289.)

As a former state employee who held a designated position in your agency's conflict of interest code, the one-year ban applies from the date you permanently left state employment, November 8, 2025. You cannot, for compensation, appear before or communicate for the purpose of influencing any administrative, or legislative actions, or any discretionary act involving the issuance, amendment, awarding, or revocation of a permit, license, grant, or contract, or the sale or purchase of goods or property with CDCR, your former agency, until November 8, 2026. Moreover, the one-year ban prohibits you from appearing before or communicating with any officer or employee of CDCR or any state agency whose budget, personnel, and other operations are under the control of CDCR.

The facts you provided present two issues under the one-year ban: first, whether you are prohibited from consulting with the ARC to assist with outreach to incarcerated individuals

regarding the Program and rehabilitative efforts. Second, whether you are prohibited from consulting with State legislators regarding legislation related to the Program.

Consultant for ARC

You have asked whether you may act as a paid consultant for the ARC to help develop their services and outreach to incarcerated populations, related to the Program. The ARC works with CDCR and CALFIRE at the Growlersburg Conservation Camp and Pine Grove Youth Conservation Camp, in partnership with Amity, which contracts with CDCR. The ARC provides life skills and life coaching to the incarcerated populations at the Conversation Camps. The one-year ban applies only to communications with, and appearances before, your former agency made for the purpose of influencing a legislative or administrative action, or discretionary action "involving the issuance, amendment, awarding, or revocation of a permit, license, grant, or contract, or the sale or purchase of goods or property." (Section Regulation 18746.1(b)(5)(C).) A former agency official may use expertise to advise clients on the procedural requirements, plans, or policies of the official's former agency so long as the employee is not identified with the new employer's efforts to influence the agency. (*See Perry* Advice Letter, No. A-94-004.) The Act does not prohibit you from consulting with the ARC to provide education related to the Program to incarcerated individuals, so long as these efforts are not for the purpose of influencing any legislative, administrative or discretionary action involving the issuance, amendment, awarding, or revocation of a permit, license, grant, or contract, or sale or purchase of goods or property and such activity is not prohibited under the permanent ban. (Regulation 18746.2.) You may assist the ARC with communications to CDCR, so long as you are not identified in these communications, and to the extent these communications are not otherwise prohibited under the permanent ban as discussed below.

Consultant on State Legislation

Several state legislators have asked you to consult on legislation related to the Program. The Act's one-year ban only prohibits you from receiving compensation to make communications or appearances before your former agency, CDCR, or employees or officers of CDCR for the purpose of influencing a legislative, administrative, or discretionary act which involves the issuance, amendment, awarding, or revocation of a permit, license, grant, or contract, or the sale or purchase of goods or property. (Regulation 18746.1(b)(5)(C).) While the one-year ban does not strictly prohibit you from communicating with State legislators regarding legislation, we caution that appearances and communications that relate to a "proceeding" involving specific parties, such as Amity's contract with the CDCR, may still be prohibited under the Act's permanent ban, as discussed below.

The Permanent Ban

The permanent ban prohibits a former state employee from "switching sides" and participating or assisting, for compensation, in certain proceedings involving the State of California and other specific parties if the proceeding is one in which the former state employee participated while employed by the State. (Sections 87401 and 87402; Regulation 18741.1.) The

permanent ban applies when an official has permanently left or taken a leave of absence from any state office or employment. (Regulation 18741.1(a)(1).)

The permanent ban applies to every "state administrative official," which is defined as "every member, officer, employee, or consultant of a state administrative agency who as part of that person's official responsibilities, engages in any judicial, quasi-judicial, or other proceeding in other than a purely clerical, secretarial, or ministerial capacity." (Section 87400(b).) "Judicial, quasi-judicial, or other proceeding" means:

> any proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, arrest, or other particular matter involving a specific party or parties in any court or state administrative agency, including, but not limited to, any proceeding governed by Chapter 5 (commencing with Section 11500) of Division 3 of Title 2 of the Government Code.

(Section 87400(c).)

An official is considered to have "participated" in a proceeding if the official took part in the proceeding "personally, and substantially through decision, approval, disapproval, formal written recommendation, rendering advice on a substantial basis, investigation, or use of confidential information ..." (Section 87400(d).) A former state official who held a management position in a state administrative agency is deemed to have participated in a proceeding if: (1) the proceeding was pending before the agency during the official's tenure, and (2) the proceeding was under the official's supervisory authority. (Section 87400(d); Regulation 18741.1(a)(4).)

Consultant for ARC

In your role at CDCR, you oversaw and coordinated the Program's operations in collaboration with CAL FIRE, ensuring compliance with applicable state correctional and firefighting standards, and you participated in management reviews and audits of the Conservation Camps. You worked with CAL FIRE on operational matters, training for incarcerated firefighters, equipment, food services, and compliance with established wildland firefighting and fire service standards. You provided subject-matter expertise to CDCR leadership regarding the Program. In overseeing the Program, you made recommendations regarding contracts involving the Program. For instance, you recommended reallocating some personnel support provided to the Pine Grove Youth Conservation Camp, under Amity's preexisting contract with CDCR, to the Growlersburg Conservation Camp, with the knowledge that the ARC was working in partnership with Amity to provide those services.

The permanent ban applies to a "proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, arrest, or other particular matter" in a court or administrative agency that involves a specific party or parties. Accordingly, the permanent ban generally prohibits you from participating in or assisting the ARC in matters related to Amity's contract, which you previously participated in. Based on the facts, the potential scope of future consulting work you may be involved in is not yet clear. To

the extent this work relates to the contract, you should seek additional advice, more fully describing the work the ARC performed under the contract, the specific work you would like to do on behalf of the ARC, and any relationship of that work to Amity's contract.

Consultant on State Legislation

The permanent ban does not apply to matters that involve the making of rules or policies of general applicability. Generally, the adoption, amendment, or repeal of regulations is not considered "judicial, quasi-judicial or other proceedings," because they involve the formulation of rules of general application to be applied prospectively and not the rights or claims of specific parties. (See *Huston* Advice Letter, No. A-84-002 and *Sweeney* Advice Letter, No. A-98-022.) Similarly, the rendering of a legal advisory opinion that does not involve a specific party or parties is specifically excluded from the definition of a "judicial, quasi-judicial or other proceeding." (Regulation 18741.1(a)(4).) However, where a regulation or policy decision focuses on specific parties, it may meet the definition of a "proceeding" subject to the permanent ban. (*Erlingsson* Advice Letter No. I-20-139.)

Similarly, we have found that, generally, legislation would not be considered a "judicial, quasi-judicial, or other proceeding" for purposes of the permanent ban because legislation typically involves rules of general applicability rather than the rights or claims of specific parties. (See *Sivalingam* Advice Letter No. I-23-154 [A former employee of the California Department of Conservation, subsequently working as a policy advisor, was permitted under the permanent ban to appear before their former agency to advocate on behalf of their client on legislative matters related to general statutes, but was cautioned that legislation specific to their client may be a "proceeding" under the Act.].) We cautioned that this advice applies to general statutes, and advocacy related to a "special statute," meaning a law that applies to a particular person, place, or interest, may meet the definition of a "proceeding" subject to the permanent ban. (*Id.*)

You state that the legislation you have been asked to consult on is related to the Program. Additionally, you assisted with the development and implementation of policies and regulations affecting the Program, including those related to new legislation and pilot initiatives such as the YOP Program, while employed at CDCR. Moreover, you indicated you would not be compensated for consulting with State legislators, but you seek to be a paid consultant advising the ARC on a related topic; therefore, we cannot conclude that you will be uncompensated for consulting on Program-related legislation. Nonetheless, based on the facts provided, it does not appear that the legislation you have been asked to consult on would meet the definition of a "proceeding." However, we caution that, to the extent that the legislation would be specific to the ARC, and you previously participated in a related legislative or regulatory decision involving ARC while employed at CDCR, you may be prohibited under the permanent ban from consulting on the legislation. (See *Id.*) If you have questions about specific legislation, you should seek additional advice detailing the legislation and your previous participation in any related proceedings.

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

Sincerely,

Dave Bainbridge
General Counsel

Margaret L. Roeckl-Navazio
By: Margaret Roeckl-Navazio
Counsel, Legal Division

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