



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

September 9, 2026

Abel Salinas
Ethics Officer
The Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

Re: Your Request for Advice
Our File No. A-26-056

Dear Mr. Salinas:

This letter responds to your request for advice on behalf of the Metropolitan Water District of Southern California Board Member Michael Camacho, regarding provisions of the Government Code Section 1090, et seq.¹ Please note that we are only providing advice under Section 1090, not under other general conflict of interest prohibitions such as the Political Reform Act or 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.

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 Los Angeles 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).)

QUESTIONS

1. Does Section 1090 prohibit the Metropolitan Water District of Southern California ("Metropolitan") from contracting with Pacifica Services, Inc. ("Pacifica") if Director

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.

Camacho resigns from Pacifica's Board of Directors ("Pacifica Board"), but remains employed as a Senior Vice President with Pacifica?

2. Does Section 1090 prohibit Metropolitan from contracting with prospective clients of Quest Technical Services, Inc. ("Quest"), a consulting business that Director Camacho solely owns? Specifically, can Metropolitan enter into contract amendments with the City of Anaheim ("City"), a member agency of Metropolitan, for the Stormwater for Recharge Pilot Program agreement that the City's Public Works Department manages, if the same City department retains Quest for consulting services?

CONCLUSIONS

1. Section 1090 bars Metropolitan from contracting with Pacifica even if Director Camacho resigns from the Pacifica Board. We do not find that the remote interest exception under Section 1091(b)(2) was intended to allow a contract between an agency and an official's family business where the official is a director of the business, and steps down as a director, thereby availing the business of the opportunity to enter into an otherwise prohibited contract.

2. The remote interest exception under Section 1091.5(a)(9) allows Metropolitan to contract with the City's Public Works Department if Quest is awarded an on-call consulting services contract with the same City department. To determine whether Metropolitan may contract with other governmental entities after they become Quest clients, additional facts about the governmental entity and the type of contract would be needed. Metropolitan may not contract with private companies that become Quest clients.

FACTS AS PRESENTED BY REQUESTER

Metropolitan is a public agency and a regional water wholesaler that delivers water to its 26 member agencies (which are government agencies) - 14 cities, 11 municipal water districts, and one county water authority - which in turn provides water to 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties.² Metropolitan is governed by a 38-member board of directors ("Metropolitan Board"), which represents its respective member agencies.

² Metropolitan's 14 member cities include: Anaheim, Beverly Hills, Burbank, Compton, Fullerton, Glendale, Long Beach, Los Angeles, Pasadena, San Fernando, San Marino, Santa Ana, Santa Monica, and Torrance. Metropolitan's 11 municipal water agencies include: Calleguas Municipal Water District, Central Basin Municipal Water District, Eastern Municipal Water District, Foothill Municipal Water District, Inland Empire Utilities Agency, Las Virgenes Municipal Water District, Municipal Water District of Orange County, Three Valleys Municipal Water District, West Basin Municipal Water District, Western Municipal Water District of Riverside County, and Upper San Gabriel Valley Municipal Water District. Metropolitan's county water authority is the San Diego County Water Authority.

Contracting Authority at Metropolitan

In the course of its duties, the Metropolitan Board votes on various types of contracts, including construction and professional consulting services contracts. Some Metropolitan contractors are selected through a competitive process and thereafter approved by the Metropolitan Board, whereas certain contracts valued at \$250,000 or less, including professional services contracts, are awarded under the Metropolitan General Manager's codified authority and are not subject to the Metropolitan Board's action or review.

Metropolitan Contracts with Member Agencies

Since 1982, Metropolitan has provided incentives to its member agencies to develop local projects through the Local Resources Program ("LRP"). A common type of contract between Metropolitan and member agencies is a LRP agreement. These agreements are regularly made help improve regional water supply reliability and support water use efficiency goals. LRPs provide financial incentives to Metropolitan member agencies to develop new local projects. LRP agreements are up to 25 years in duration. Typical LRP projects include groundwater recovery and recycled water projects. Local entities, including Metropolitan's member agencies, submit LRP applications to Metropolitan, and the Metropolitan Board ultimately votes on whether to approve the proposed agreement. Selections are based on Board-adopted guidelines and criteria for LRP projects.

Metropolitan and member agencies also enter into Stormwater for Recharge Pilot Program agreements, which are not funded through the LRP.

Metropolitan has several contracts with the City, which are often amended. Metropolitan's Stormwater for Recharge Pilot Program agreement with the City allows for the reactivation and repurposing of approximately 10,000 linear feet of large-diameter abandoned wastewater pipe for stormwater runoff treatment, capture, and infiltration, as well as a minimum of three years of stormwater recharge monitoring and reporting.

Director Michael Camacho

Director Camacho joined the Metropolitan Board in 2011 as the representative for the Metropolitan member agency, the Inland Empire Utilities Agency ("IEUA"), of which he is a member of the Board of Directors. He currently serves as the Vice Chair of the Metropolitan Board, and is a member of various Metropolitan committees. As a member of the Metropolitan Board, Director Camacho must file a statement of economic interests ("SEI").

Pacifica Services, Inc.

Director Camacho is employed by Pacifica, a Pasadena-based full-service engineering, environmental services, and project and construction management firm founded by his father, Ernest Camacho, Chief Executive Officer ("CEO") and President. Pacifica has served the public and private sectors for over 45 years in fields including energy, education, infrastructure, water, and wastewater. In prior years, Pacifica has developed environmental impact reports and

provided construction, management, inspection, and other services for other California water districts.

Pacifica has approximately 60 employees. Although staff size varies over time, Pacifica consistently maintains 10 or more employees. Director Camacho has been employed by Pacifica since 1985 and currently serves as a Pacifica Board Member and the Senior Vice President of Marketing and Business Development. Director Camacho receives an annual salary and a year-end holiday bonus. He has no other personal financial interest in Pacifica beyond his annual salary and year-end bonus (no ownership, stock, commission income, business trust assets, etc.). His spouse has no financial interest in Pacifica.

We previously advised that Section 1090 prohibits Metropolitan from contracting with Pacifica while Director Camacho is a Pacifica Board Member because he has a financial interest in any contracts involving Pacifica. (*Riss Advice Letter*, No. A-18-153.) Director Camacho is considering stepping down from the Pacifica Board. If he resigns, he will no longer be identified as a director or officer in Pacifica's state filings or otherwise serve as a director.

Quest Technical Services, Inc.

Separately, Director Camacho owns a consulting business, Quest Technical Services, Inc. ("Quest"). He is the sole owner and serves as Quest's President, CEO, and Secretary. Quest offers the following services: Program, Project, and Construction Management and Inspection, Technical, Advocacy, and Strategy services. Quest's desired markets include water, education, and transportation in the private and public sectors.

Director Camacho reports his financial interests in Quest on his SEI. In recent years, he has reported income from two clients. He plans to expand his consulting business and client roster, but would like to understand any potential impacts to Metropolitan and his service on the Metropolitan Board. Based on the types of services Quest provides and the location of its services, Director Camacho anticipates that Quest will have ongoing opportunities to submit for projects with contractors and consultants that have contracts with Metropolitan. However, Director Camacho represents that his firm will not participate in Metropolitan projects or contracts, as a contractor or subcontractor.

City of Anaheim's Request for Proposals (RFP)

Director Camacho is interested in Quest submitting a proposal to the City's Public Works Department's Construction Services Division's RFP for on-call consulting services related to architectural facility design, project/construction contract administration, construction inspection and management, and project close-out activities. According to the RFP, requested services encompass a broad range of disciplines and may include, but not be limited to, architectural drafting and design, specification writing, constructability reviews, contract administration, construction management, observation and inspection, resident engineer services, environmental consulting, as-built/Operations and Maintenance review activities, routine maintenance and repair of facilities, administrative and clerical support, and web-based document management/construction management support. Projects requiring support services may include,

but are not limited to, capital improvement projects, facility and system maintenance and rehabilitation projects, or private developer-type projects.

ANALYSIS

Section 1090 generally prohibits public officers, 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 officials involved from exercising absolute loyalty and undivided allegiance to the best interests of their respective agencies. (*Stigall v. City of Taft* (1962) 58 Cal.2d 565, 569 (*Stigall*).) Section 1090 is intended not only to strike at actual impropriety but also to strike at the appearance of impropriety. (*City of Imperial Beach v. Bailey* (1980) 103 Cal.App.3d 191, 197 (*City of Imperial Beach*).) A contract that violates Section 1090 is void. (*Thomson v. Call* (1985) 38 Cal.3d 633, 646 (*Thomson*).) The prohibition applies regardless of whether the terms of the contract are fair and equitable to all parties. (*Id.* at pp. 646-649.)

Under Section 1090, “the prohibited act is the making of a contract in which the official has a financial interest.” (*People v. Honig* (1996) 48 Cal.App.4th 289, 333 (*Honig*).) An official “makes” a contract if the official participates in any way in the making of the contract, including involvement in matters such as preliminary discussions, negotiations, planning, drawing of plans and specifications. (*Millbrae Assn. for Residential Survival v. City of Millbrae* (1968) 262 Cal.App.2d 222, 237; see also *Stigall, supra*, 58 Cal.2d at p. 569.)

As a member of the Metropolitan Board, Director Camacho is subject to the provisions of Section 1090. Additionally, due to his status as a Board member, he is presumed to be involved in the making of all contracts by Metropolitan, irrespective of whether he actually participates in the making of the contract. (*Thomson, supra*, 38 Cal.3d at pp. 645, 649.) The determinative question is whether he has a financial interest under Section 1090 in a contract between Metropolitan and Pacifica arising from his employment with Pacifica, or in a contract between Metropolitan and a Quest client as a source of income, that would prohibit Metropolitan from making the contract.

Financial Interests

Pacifica

Employment

Although 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. (*People v. Vallerga* (1977) 67 Cal.App.3d 847, 867, fn. 5; *Terry v. Bender* (1956) 143 Cal.App.2d 198, 207-208; 85 Ops.Cal.Atty.Gen. 34, 36-38 (2002); 84 Ops.Cal.Atty.Gen. 158, 161-162 (2001).) Officials are deemed to have a financial interest in a contract if they might profit from it in any way. (*Honig, supra*, 48 Cal.App.4th at p. 333.)

The California Supreme Court in *Lexin v. Superior Court* (2010) 47 Cal.4th 1050 (*Lexin*) stated that the situation “where public officials on behalf of a public entity participate in making a contract with a second entity for which they work, the scenario poses at least the risk that the officials will be compromised by serving ‘two masters.’” (*Lexin*, at p.1075, citing *Thomson, supra*, 38 Cal.3d at p. 645 and fn. 14 [additional citations omitted].) Employees have been found to have a financial interest in a contract that involves their employer, even where the contract would not result in a change in income or directly involve the employee, because an employee has an overall interest in the financial success of the firm and continued employment. (84 Ops.Cal.Atty.Gen. 158, 161-162 (2001).)

Therefore, Director Camacho has a financial interest in an agreement between Metropolitan and his employer, Pacifica. Absent an exception, Section 1090 would prohibit the contract.

Quest Client

Source of Income (Client)

In the *Ueda* Advice Letter, No. A-16-104, we advised that Section 1090 prohibits a commissioner from providing recommendations on financing contracts involving clients of his consulting business to specified government agencies. The *Ueda* Advice Letter cited a 2003 Attorney General Opinion, in which the board of a redevelopment agency anticipated entering into contracts with business firms intending to locate or expand their offices in a certain redevelopment project area. (86 Ops.Cal.Atty.Gen. 187 (2003).) Several of those businesses were clients of one of the board member’s promotional products company. (*Ibid.*) In determining that the board member would have a financial interest in any contracts between the redevelopment agency and those businesses, the Opinion stated:

The board member would have a “financial interest” in the contracts due to his business relationship with the contracting parties as a supplier of goods or services. (See 85 Ops.Cal.Atty.Gen. 176, 177-179 (2002); 85 Ops.Cal.Atty.Gen. 34, 35-37 (2002).) In this regard, the board member could be influenced by the prospect of future business opportunities directly related to the contracts or by a desire to maintain favorable ongoing relationships with the contracting parties. The Legislature has made clear that ongoing business relationships may represent financial interests for purposes of section 1090. (See, e.g., § 1091, subd. (b)(5), (b)(6), (b)(8).) The purpose of section 1090 “is to remove or limit the possibility of any personal influence, either directly or indirectly, which might bear upon an official’s decision....” (*Stigall v. City of Taft* (1962) 58 Cal.2d 656, 569; *Finnegan v. Schrader* (2001) 91 Cal.App.4th 572, 579-580; *Thorpe v. Long Beach Community College Dist.* (2000) 83 Cal.App.4th 655, 659; *Frazer-Yamor Agency, Inc. v. County of Del Norte* (1977) 68 Cal.App.3d 201, 215.)

Here, Director Camacho owns his consulting firm, Quest, to provide clients with Program, Project, and Construction Management and Inspection, Technical, Advocacy, and Strategy services. It is difficult to imagine how he could ever provide his absolute, undivided allegiance to the Metropolitan Board as a public servant while participating in the contracting process involving his own clients. A real potential exists for the director to curry favor with his clients, understanding that it may ultimately affect his ongoing consulting business with them and other future business opportunities. This is exactly the type of indirect interest Section 1090 attempts to thwart. (See, e.g., 88 Ops.Cal.Atty.Gen. I 06, I 07 (2005) citing *Frazer-Yamor Agency, supra*, 68 Cal.App.3d at pp. 214-215 [California courts strictly enforce Section 1090, and have consistently voided contracts where they find the public officer has an indirect interest in the contract; indeed, even though an officer may not directly benefit from the terms of the contract, it is significant that the contract will contribute to the financial health of the contracting party with which the officer is associated].)

Therefore, Director Camacho has a financial interest in an agreement between Metropolitan and a Quest client. Absent an exception, Section 1090 would prohibit the contract.

Remote Interest & Noninterest

The Legislature has created various statutory exceptions to Section 1090's 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. If a remote interest is present, the contract may be made if the officer fully discloses the interest, the interest is noted in the agency's official records; and the officer abstains from any participation in the making of the contract. (Section 1091(a).) If a noninterest is present, the contract may be made without the officer's abstention, and a noninterest generally does not require disclosure. (*City of Vernon v. Central Basin Mun. Water Dist.* (1999) 69 Cal.App.4th 508, 514-515.)

Pacifica

We previously advised that Section 1090 prohibits Metropolitan from contracting with Pacifica while Director Camacho is a Pacifica Board Member because he has a financial interest in any contracts involving Pacifica. (*Riss Advice Letter*, No. A-18-153.) Under the present circumstances, for Pacifica, the pertinent "remote interest" exception to consider is the application of Section 1091(b)(2), which specifies the following as a remote interest:

That of an employee or agent of the contracting party, if the contracting party has 10 or more other employees and if the officer was an employee or agent of that contracting party for at least three years before the officer initially accepting their office and the officer owns less than 3 percent of the shares of stock of the contracting party; and the employee or agent is not an officer or director of the contracting party and did not directly participate in formulating the bid of the contracting party.

The Senate Local Government Committee expressed that the remote interest exception in Section 1091(b)(2) was amended by Senate Bill (SB) 281 (Chp. 687, Stats. 1998) to include three

additional conditions – that the “agency’s board member must also own less than 3% of contractor’s stock, not be an officer of the contractor, and must not directly participate in formulating the contractor’s bid.”³ The additional conditions, the Committee noted, disqualified growers sitting on the boards of landowner voter districts from contracting with farms they owned: “[t]hey own stock in the family farming business, are officers of the family business, and they probably helped with the bid.”⁴ According to the Assembly Committee on Local Government’s analysis of SB 281,⁵ the provision that a member of the legislative body not be an officer of the company was added to Section 1091(b)(2) due to concerns that, although there is a cap on stock ownership, the board of directors might later raise the officer’s salary and raise an issue of impropriety.

If Director Camacho resigns from the Pacifica Board, the determinative issue is whether the remote interest exception in Section 1091(b)(2) would apply. Pacifica is a corporation with at least 10 employees. Director Camacho has been employed by Pacifica for more than 40 years, and was employed by Pacifica for at least 14 years before he joined the Metropolitan Board. Director Camacho does not own any Pacifica stock. In addition to serving as a director, Director Camacho is a Senior Vice President at Pacifica, and his responsibilities include Marketing and Business Development, as well as client relations in the Southern California region.

If Director Camacho resigns from the Pacifica Board, he would serve as a Senior Vice President only, and would no longer serve as a corporate officer or director for Pacifica.⁶ However, he would remain a Pacifica employee in a family business for which he previously served as a member of the board of directors for decades. Additionally, the legislative intent of Section 1091(b)(2) evidences that the Legislature was expressly concerned with prohibiting directors and officers of a family business from contracting with their agency under the exception. Considering this history, we do not find the act of stepping down as a director from a family business in anticipation of a future contract is a situation in which Section 1091(b)(2) was intended to apply. Rather, Section 1091(b)(2) was intended to apply to only those employees who were not directors or officers serving in high-level managerial positions and nothing in

³ See Senate Local Government Committee Analysis of SB 2064 (of 2000), March 29, 2000 version (hearing date: April 5, 2000).

⁴ *Ibid.*

⁵ Assembly Committee on Local Government Analysis of SB 281, as amended July 30, 1998 (hearing date: August 19, 1998).

⁶ See *Calciano* Advice Letter, A-20-084 (Section 1091(b)(2) remote interest applied because Councilmember employed as Director of Government Affairs of company providing solid waste management services was not an officer or director of said company); *Calciano* Advice Letter, A-18-152 (Section 1091(b)(2) remote interest applied because Councilmember employed as Director of Government Affairs of company providing street sweeping services was not an officer of said company); *Googins* Advice Letter, A-20-065 (Section 1091(b)(2) remote interest applied because Councilmember’s husband, who was a Senior Vice President of bank’s wealth management division was neither a corporate officer nor director of the bank).

Section 1091(b)(2) suggests that the conflict can be cured merely by resigning as a director or officer in anticipation of future contracting opportunities that would otherwise be prohibited.

As noted above, Section 1090 is concerned with financial interests that could prevent an official from exercising absolute loyalty and undivided allegiance to their agency. (*Stigall, supra*, 58 Cal.2d 565, 569.) Section 1090 is also intended not only to strike at actual impropriety but also to strike at the appearance of impropriety. (*City of Imperial Beach, supra*, 103 Cal.App.3d 191, 197.)

The suggestion that Director Camacho resign from the Pacifica Board to transform a disqualifying interest into a remote interest and allow Pacifica to contract with Metropolitan, while he remains on the Metropolitan Board and employed by Pacifica, appears outside of the intent of Section 1091(b)(2). By serving on the Pacifica Board for decades, Director Camacho would have had the opportunity to provide strategic direction and executive decision-making regarding projects Pacifica would submit proposals or bids, and to influence future contracts (including with Metropolitan). Permitting Pacifica to submit proposals for contracts with Metropolitan, on whose board Director Camacho remains active, merely by stepping down from the Pacifica Board after a lengthy tenure runs counter to the intent of Section 1091(b)(2) in light of his previous and continuing interests in Pacifica.

Quest Client

Under the present circumstances, for Pacifica, the pertinent “remote interest” exception to consider⁷ is the application of Section 1091(b)(8), which specifies that “a supplier of goods or services when those goods or services have been supplied to the contracting party by the officer for at least five years prior to their election or appointment to office” is a remote interest. However, since Director Camacho is asking about prospective clients, the exception under Section 1091(b)(8) would not apply. No other exception would apply to private clients. Accordingly, Metropolitan cannot enter into contracts with a new private client of Quest.

We also consider the application of the exceptions under Sections 1091(b)(13) and 1091.5(a)(9) for government clients of Quest. Those Sections both apply to “a person receiving salary, per diem, or reimbursement for expenses from a government entity.” However, the difference between the two Sections is that the remote interest exception under Section 1091(b)(13) applies instead of the non-interest exception under Section 1091.5(a)(9) when the contract directly involves the department of the government entity that employs the officer or

⁷ You asked whether the remote interest exception under Section 1091(b)(17) applies. Section 1091(b)(17) reads as follows:

(17) That of an owner or partner of a firm serving as an appointed member of an unelected board or commission of the contracting agency if the owner or partner recuses himself or herself from providing any advice to the contracting agency regarding the contract between the firm and the contracting agency and from all participation in reviewing a project that results from that contract.

However, since your question does not involve contacts between Director Camacho’s company, Quest, and Metropolitan, Section 1091(b)(17) does not apply.

employee. In that instance, the contract may be made if the officer fully discloses the interest, the interest is noted in the agency's official records; and the officer abstains from any participation in the making of the contract. (Section 1091(a).) On the other hand, when the contract directly involves a different department of the government entity that employs the officer or employee, the remote interest exception under Section 1091.5(a)(9) applies. For that scenario, the officer may participate, but the remote interest must be disclosed to the body or board at the time the contract is considered and noted in the official record. (*See* Section 1091.5(a)(9).)

In the *Winuk* Advice Letter, No. A-24-103, we examined whether the phrase "person receiving salary, per diem, or reimbursement for expenses from a government entity" applied to the remote interest exception under Section 1091(b)(13) and the noninterest exception under Section 1091.5(a)(9). We advised that "we believe[d] the Legislature did not intend to categorically exclude paid consultants of a government entity from coming within the scope of the two government salary exceptions." In the *Winuk* Advice Letter, the Commission advised that Section 1090 did not bar a port district commissioner or the district, from entering into a contract with another government agency under the noninterest exception of Section 1091.5(a)(9) where the commissioner's company would provide consulting services to a unit within the government agency different than the one contracting with the district.

Here, Director Camacho's company, Quest, is interested in submitting a proposal for on-call consulting services to the City's Public Works Department's Construction Services Division. If the on-call consulting services contract is awarded to Quest, Director Camacho would receive payments from the City. If the Metropolitan Board subsequently considers an amendment to the Stormwater for Recharge Pilot Program agreement between Metropolitan and the City, that contract amendment would directly involve the City's Public Works Department's Engineering Services, which would still be the same department that employs Quest as an independent contractor. Per the *Winuk* Advice Letter, the Metropolitan Board can approve an amendment to the Stormwater for Recharge Pilot Program agreement as a remote interest exception under Section 1091(b)(13), but Director Camacho would need to fully disclose his interest in the City, the interest must be noted in Metropolitan's official records, and he must abstain from any participation in the making of the contract.⁸

You did not name any other Metropolitan member agencies as potential Quest clients or specific contracts at issue other than the Stormwater for Recharge Pilot Program agreement. To the extent any other member agencies (or governmental entities) become Quest clients, please provide additional facts to allow the Commission to determine whether the remote interest exception under Section 1091(b)(13) or the non-interest exception under Section 1091.5(a)(9) would apply to a specific type of contract between Metropolitan and a Quest client that is also a member agency of Metropolitan (or a government entity).

⁸ Since the remedy in this situation is for Director Camacho to abstain from any participation in the approval of the contract due to his remote interest, we do not need to further analyze the conflict of interest issue raised under the Act, although we note that the Act requires the director to leave the room during discussion at any public meeting of the board. (*See* Regulation 18707.)

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

Sincerely,

Dave Bainbridge
General Counsel

Joanna Gin

By: Joanna Gin
Senior Counsel, Legal Division

JG:aja