



CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
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To: Chair Silver and Commissioners Brandt, Ortiz, Wilson, and Zettel

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

Subject: Advice Letter Report

Date: December 1, 2025

The following advice letters have been issued since the October 31, 2025, Advice Letter Report. An advice letter included in this report may be noticed for further discussion or consideration at the January 15, 2026, Commission Meeting. Full copies of the FPPC Advice Letters, including those listed below, are available at [the advice search](#).

Campaign

Dan Miller - [A-25-157](#)

In connection with a January 27, 2026, special election in Marin County, candidates and committees may use a filing schedule that combines the semi-annual campaign statement with the second pre-election statement. The combined statement will be due on January 15, 2026, covering the period from December 14, 2025, through January 10, 2026.

Conflict of Interest

Richard D. Pio Roda - [I-25-086](#)

Generally, a city engineer with property interests has a prohibitive financial interest in decisions regarding the city's community-based transportation plan, where the real property interests are located within 500 feet of the plan area. However, the city engineer is not generally prohibited from taking part in decisions related to the city's development plan to implement the city's transit-oriented specific plan based on interests in real property if the properties are located over 1,000 feet from the boundaries of the development plan, unless there is a clear and convincing financial effect on the property. However, the financial effect of any specific decisions on the property interests, and any other interests held by the official, must be examined on a case-by-case basis depending on the specific nature of the decisions, which have not yet been identified.

Kristopher J. Kokotaylo - [A-25-130](#)

For two city officials who rent residential real properties subject to prospective ordinances relating to landlord-tenant rights, the public generally exception permits the officials to take part in decisions relating to the ordinances because the ordinances would impact a significant segment of the public and the officials' respective interests would not be uniquely affected.

Solvi Sabol - [A-25-142](#)

An official who serves as the executive director and treasurer of a county transportation planning agency is a public official who manages a public investment and must file Statements of Economic Interests directly with the Commission pursuant to Section 87500(a)(2)(O).

Revolving Door**Andrew Quinn - [I-25-127](#)**

Under the Act, the “one-year ban” prohibits a former state official from appearing before or communicating with their former agency as a paid consultant for the purpose of influencing any administrative, legislative, or discretionary action, to the extent that such action involves the issuance of a permit, license, grant, contract, or sale of goods or property. The “permanent ban” also prohibits the former state official from “switching sides” and participating or assisting in proceedings involving the State of California and specific parties if the official previously participated in the proceedings while employed by their former agency.

Section 1090**Lilliana K. Selke - [A-25-035](#)**

A water district board member with a financial interest in property over which the district must purchase an easement to build a water pipeline has a disqualifying financial interest under the Act and may not participate in the easement decision or purchase. Under Section 1090, the rule of necessity permits the district to contract with the trust that owns the property to purchase the easement, provided that the board member abstains. Once the pipeline project is completed, the trust may contract with the district for the provision of water under Section 1091.5(a)(3), which provides a non-interest exception for public services generally provided.

A. Patrick Munoz - [A-25-131](#)

A councilmember’s ownership of a home does not create a disqualifying conflict of interest in decisions or contracts involving a nonprofit under either the Act or Section 1090 merely because the home was received from the councilmember’s mother, who was provided assistance to construct the home from the nonprofit more than 25 years previously.

Joshua Nelson - [A-25-133](#)

An independent contractor’s project manager, who advised an agency on the formation of a request for proposals, is a public officer who will have a prohibited financial interest in any contract resulting from the request for proposals. Thus, the agency may not contract with the project manager’s new employer, which submitted a proposal in response to the request for proposals.

Melissa Crick - [A-25-150](#)

A school district board member, who is also employed as the executive director at a nonprofit 501(c)(3), must not take part in any school board decisions relating to grant project decisions involving the nonprofit. Under the Act, it is reasonably foreseeable the decisions will have a material financial effect on the nonprofit, which is a source of income to the official. Under 1090, the board member has a remote interest in the nonprofit under Section 1091(b)(1), and the

school district may participate in memorandums of understanding with other participant agencies and entities, including the nonprofit, in the grant project, so long as the board member recuses herself from any participation in the grant project. The board member may take part in project decisions as the executive director of the nonprofit organization before agencies, other than the school district, so long as she is acting only in a private capacity and does not act or purport to act on behalf of the official's agency.