



December 12, 2012

Chair Ann Ravel and Commissioners  
Fair Political Practices Commission  
428 J Street, Suite 800  
Sacramento, CA 95814

**RE: Agenda Item 82: Amendment of Regulation 18705.5 – Personal Finances,  
Appointments to Committees**

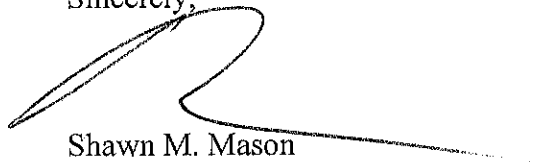
Dear Chair Ravel and Commissioners:

On behalf of the League of California Cities City Attorneys Department FPPC Committee, I submit this letter for comment on the above-referenced agenda item. The proposed amendment comes at the request of attorneys on behalf of their special district clients. It appears that the boards of some of these districts appoint standing and ad hoc committees comprised of board members, and that the appointed committee members receive additional compensation for their committee service. The proposed amendment would allow board members to participate in decisions to appoint themselves to board committees, even when such appointments would result in the board members receiving more than \$250 in additional compensation during a 12 month period.

Our committee considered this proposal and our members are unaware of any cities that provide additional compensation to council members appointed to serve on ad hoc or standing committees of the council. For this reason, our formal position on the proposal is to be neutral. Having said this, we believe your staff has ably analyzed the issues presented by the proposal, and we support staff's conclusions. In particular, we agree with staff that the procedural safeguards added to the regulation earlier this year requiring online reporting of appointments will protect against potential abuse. In addition, we agree that allowing public officials to openly debate their individual qualifications for committee positions will result in a better informed public. We also believe this will lead to better decision-making on these appointments.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by a horizontal line that extends to the right.

Shawn M. Mason  
City Attorney of San Mateo

cc: Zackery P. Morazzini, General Counsel  
Sukhi K. Brar, Commission Counsel