

## **Julianna Contreras**

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**From:**  
**Sent:** Saturday, May 13, 2023 6:59 AM  
**To:** CommAsst  
**Subject:** Interpretation of Honorarium rules

EXTERNAL EMAIL

Honorable members of the Fair Political Practices Commission:

It has come to my attention that a city council member in Palo Alto recently received an advice letter from the FPPC which advised that her receipt of money for speeches and other writings in a location which is not part of her jurisdiction as an elected official is a violation of the honorarium rules.

This interpretation of the honorarium rules makes no sense whatsoever. If she is receiving money from her constituents for speeches and writings, then certainly there can be a conflict of interest which should be disclosed and should not be permissible.

But when the money received by an elected official is not earned in her jurisdiction and is the way that she supports her family - there is no conflict and no rational reason to find her in violation of her obligations as an elected local official in by the California FPPC.

The FPPC should alter the regulation to be clear that working outside of the jurisdiction of the official giving speeches (in her case) on issues of democracy, and receiving a payment for them, when this work is outside of the jurisdiction, there should be no violations the honorarium rules, nor is there a violation of the purpose or intent of the regulations, or the law.

Thank you for your attention to this matter.

Ann Ravel  
Former Chair, CA Fair Political Practices Commission