



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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First Quarter Update

Ethics – Gifts, Honorarium, Travel and Use of Campaign Funds

Regulations adopted by the Commission

The following are regulatory changes approved by the Commission during the past quarter concerning gifts, honorarium, travel, and use of campaign funds. To receive updates for all regulations before the Commission, please sign up for our [mailing list here](#).

None.

Advice Letters

The following are advice letters issued by the Commission's Legal Division during the past quarter concerning questions about gifts, honorarium, travel, and use of campaign funds. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Gifts

Arthur Liou

[I-23-039](#)

If provided for the purpose of educating the participants in matters related to the performance of their official duties, the cost of leadership training for newly elected state and local legislators would be informational material and not be regarded as "gifts" to the participants under the Act. However, the informational material exception would not apply to any other related payments including payments for transportation, accommodations, meals, or the reimbursement of other expenses.

Personal Use

James C. Harrison

[I-23-018](#)

Train passes provided at no cost to members of an agency's Board of Directors do not constitute gifts or income to the officials, provided that issuance of the passes constitutes a permissible use of public funds. However, the passes are gifts under Regulation 18944.3 if the issuance of passes is an impermissible use of public funds, and we express no opinion regarding laws addressing the permissible use of public funds outside of the Act.

Commission Opinions

None.

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter concerning gifts, honorarium, travel, and use of campaign funds. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

Behested Payments

In the Matter of William Dodd; FPPC No. 19/439. Staff: Neal Bucknell, Senior Commission Counsel. The respondent is represented by Gary Winuk and Joseph Guardarrama of the Kaufman Legal Group. Dodd is a member of the California State Senate, District 3. In 2017 and 2018, numerous donors made charitable payments in amounts of \$5,000 or more to the Salvation Army and the Napa Valley Education Foundation at Dodd's behest, but Dodd failed to timely report 27 of these payments, totaling \$481,900, in violation of Government Code Section 82015, subdivision (b)(2)(B)(iii), as in effect prior to 2018, and Section 84224, as in effect after 2017 (5 counts). **Fine: \$7,500.**

Gifts Over-the-Limit

In the Matter of Jeffrey Bryant; FPPC Case No. 20/201. Staff: Jenna C. Rinehart, Commission Counsel. The respondent was represented by Ren Nosky of JRG Attorneys at Law. Jeffrey Bryant, General Manager of the Firebaugh Canal Water District and Alternate Director of the San Joaquin River Exchange Contractors Water Authority, failed to timely report the receipt of gifts on the 2015 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (2 counts). Additionally, these gifts exceeded the applicable annual gift limit, in violation of Government Code Section 89503 (2 counts). **Fine: \$13,000.**

Legislation

None.