



THE CITY OF SAN DIEGO

November 7, 2011

Via Email and U.S. Mail

Chair Ann Ravel and Commissioners  
Fair Political Practices Commission  
428 J Street, Suite 620  
Sacramento, CA 95814

Re: Adoption of Amendments to Regulations 18940 through 18950.4

Dear Chair Ravel and Commissioners:

We would like to take this opportunity to thank the Fair Political Practices Commission, and Commission Counsel Bill Lenkeit in particular, for graciously allowing the City of San Diego Ethics Commission to participate in the amendments of the state's gift regulations. This was clearly an enormous project requiring countless revisions based on input from many parties with often opposing perspectives. As but one interested party, we sincerely appreciate the time that Mr. Lenkeit spent considering our comments and suggestions, and working with us on ways to streamline and clarify the regulations.

We believe that the amendments as currently drafted represent a substantial improvement over the existing regulations. They eliminate redundancy and confusion in favor of simpler, more practical, and more enforceable provisions. Although it may be impossible to devise gift regulations that please everyone in every instance, we are confident that the proposed amendments will provide a significantly improved regulatory framework for all involved parties.

Accordingly, we encourage the Commission to adopt the proposed amendments to Regulations 18940 through 18950.4.

Sincerely,

Stacey Fullhorst  
Executive Director

Stephen Ross  
Education Program Manager



**Ethics Commission**

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