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December 22, 2025

VIA E-MAIL

Dave Bainbridge
General Counsel
Fair Political Practices Commission
1102 Q Street, Suite 3050
Sacramento, CA 95811

Re: *Request for Further Written Advice for the California County Assessors' Information Technology Authority (A-25-133)*

Dear Mr. Bainbridge:

As communicated in my October 1, 2025 advice request ("October Letter"), our firm acts as General Counsel for the California County Assessors' Information Technology Authority ("CCAITA"). On behalf of CCAITA's Board President, I am seeking further formal written advice from the FPPC regarding CCAITA's ability to enter into a contract in accordance with the requirements of Government Code section 1090 ("Section 1090") and based on the additional facts below.

BACKGROUND AND QUESTION

By way of brief background, my October Letter sought advice on if CCAITA could contract with Just Appraised Inc. ("Just Appraised") for the development of an information technology program ("IT Program") when: (1) CCAITA engaged TEKsystems, Inc. to develop and issue RFP No. 01-25; (2) Mr. Matt Kissinger ("Mr. Kissinger") was previously the project manager for this procurement; and (3) Mr. Kissinger was serving as an independent contractor for Just Appraised. Your office advised that CCAITA was prohibited from contracting with Just Appraised for the IT Program due to Mr. Kissinger's participation in the program RFP and his financial interest in Just Appraised, where Mr. Kissinger is employed as an independent contractor. (Advice Letter No. A-25-133, copy attached.) After the receipt of your advice letter, Just Appraised provided new facts to CCAITA and requested for CCAITA to seek additional advice from the FPPC. We are providing these new facts for your consideration.

ADDITIONAL FACTS

Mr. Kissinger's involvement with CCAITA was through his employment with TEKsystems, who contracted with CCAITA. Mr. Kissinger left his duties as a Project Manager for CCAITA on or about May 2025 and ultimately left TEKsystems.

On June 20, 2025, Mr. Kissinger contacted Just Appraised and offered to assist with Just Appraised's proposal in response to a San Diego County Clerk of the Board solicitation. This solicitation was not related to the IT Program.

On June 27, 2025, Just Appraised submitted its proposal in response to the CCAITA IT Program RFP.

On or about August 11, 2025, Just Appraised entered into an hourly consulting agreement with Mr. Kissinger to assist with Just Appraised's San Diego Clerk of the Board proposal, and Mr. Kissinger started on August 13, 2025. Mr. Kissinger's tasks were limited in scope under this consulting agreement, consisting of contacting assessors about Clerk of the Board appeals. During his time at Just Appraised, Mr. Kissinger did not participate in or advise on Just Appraised's CCAITA proposal, strategy, pricing, or communications with CCAITA during his tenure as an independent contractor for Just Appraised.

On October 22, 2025, Mr. Kissinger concluded his last day with Just Appraised. He is no longer serving as a Just Appraised independent contractor, has no ongoing financial relationship with Just Appraised, and will not receive any additional compensation or benefits from Just Appraised.

REQUEST

Based on the new facts outlined above, CCAITA seeks guidance from the FPPC as to whether CCAITA is still prohibited from contracting with Just Appraised for the IT Program. We appreciate your prompt attention to this request for advice. Please feel free to contact me directly if you would like any additional information.

Sincerely,



Joshua Nelson
of BEST BEST & KRIEGER LLP