

EXHIBIT 21-B

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TO: Chairman Pendergrass, Board Members & General Manager

The City requires a current campaign finance statement to be filed with the City Clerk the Friday before the date of the election.

3. Recusal

An official must recuse him or herself from making or influencing any decision which provides a Material Financial Effect ("MFE") to a contributor accumulating to \$250 or more. The contributions relate to the official's current term of office. The official may still exercise his or her First Amendment Right of free speech.

The City's recusal period is longer than the "previous twelve months" required under state law. State law also requires intent, and the official must know of the financial interest of the party and the party's contribution. Additionally, a contributor with an action pending before the official must disclose his or her contribution.

4. Exchange of Financial Advantages

No person shall contribute and no person shall deposit a contribution to an elected official's campaign which accumulates to \$250 or more following his or her participation in the making a governmental decision providing a MFE to the contributor. The MFE must not be similarly provided to the general public or a large class of persons.

The City's recusal period lasts for the entire term of office. Under state law, by contrast, contributions are prohibited only while a proceeding is pending and for the three months following the decision.

5. Private Enforcement

Any member of the public can make a complaint and file it with the City Clerk for referral to the