

## COMPLAINT RECEIVED

The Enforcement Division of the Fair Political Practices Commission received the enclosed complaint, COM-05012026-01542, on 5/1/2026 9:05:00 AM. The information filed in the complaint is below and any attachments filed will be included.

The following individuals are the named parties in this complaint:

Robert Berry  
Complainant

Bryce Goldstein  
Respondent

The Violations alleged are:

Conflict of Interest  
General Rule (87100)

### III. STATEMENT OF FACTS

This complaint concerns potential violations of the Political Reform Act arising from Council Member Bryce Goldstein's participation in, advocacy for, and vote on a downtown redevelopment project affecting the 100 block of Main Street in Chico, California.

#### 1. Real Property Interest (Leasehold)

According to Council Member Goldstein's publicly filed Form 700, she holds a leasehold interest in office space located in the 116 of Main Street in Chico, California. The lease reportedly has approximately one year remaining and is located within a building in the project area targeted for downtown redevelopment.

#### 2. Project Proximity and Scope

The redevelopment project directly affects the Main Street corridor, including the 100 block where the Respondent's leased office space is located. The project involves changes to street configuration, access, traffic patterns, and related infrastructure.

#### 3. Participation and Vote

Council Member Goldstein publicly expressed support for the project, invited public questions regarding the project, and voted in favor of approval. Her vote contributed to a deadlocked outcome, making her participation outcome-determinative.

#### 4. Employment with Caltrans

Council Member Goldstein has publicly stated that she is employed by the California Department of Transportation as a transportation planner.

#### 5. Caltrans Role in Funding

The project at issue is funded, in whole or in part, through an Active Transportation Program (ATP) grant administered by Caltrans. Public statements regarding the project emphasize the urgency of approval in order to secure or retain such grant funding.

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### IV. ALLEGED VIOLATIONS

#### A. Disqualifying Financial Interest – Real Property

(Government Code § 87100; § 87103(b); 2 CCR § 18702.2)

Council Member Goldstein held a leasehold interest in real property located within the project area at the time of her participation and vote.

Under 2 CCR § 18702.2, a real property interest located within 500 feet of a project is presumed to be subject to a material financial effect. Given that the Respondent's leased office is located in the 100 block of Main Street, within the project boundaries, the presumption of materiality appears to apply.

The project's scope—affecting access, traffic flow, parking, and surrounding infrastructure—creates a reasonably foreseeable potential for material financial effects on the value or utility of the leasehold interest.

Despite this, Council Member Goldstein participated in discussions, publicly advocated for the project, and voted in favor of its approval.

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#### B. Potential Financial Interest – Source of Income (Employment)

(Government Code § 87103(c); 2 CCR § 18702.3)

Council Member Goldstein is employed by the California Department of Transportation, which administers or is otherwise responsible for funding the ATP grant supporting the project.

This complaint does not allege a definitive conflict on this basis, but raises a reasonable question requiring investigation:

Whether the Respondent's employment duties, performance metrics, or professional responsibilities as a transportation planner may create a reasonably foreseeable and material financial effect on her source of income arising from approval of a Caltrans-funded project.

If the Respondent's role includes involvement in program implementation, grant administration, performance evaluation, or related functions tied to ATP-funded projects, then approval of such a project could potentially affect her employment interests.

This issue is presented for the Commission's evaluation of whether a sufficient nexus exists under applicable law.

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#### V. REQUEST FOR INVESTIGATION

The Complainant respectfully requests that the Fair Political Practices Commission:

1. Determine whether Council Member Goldstein's leasehold interest in real property within the project area constituted a disqualifying financial interest requiring recusal;
2. Determine whether her participation, advocacy, and vote violated Government Code § 87100;
3. Evaluate whether her employment with Caltrans creates a disqualifying financial interest under Government Code § 87103(c), based on her specific job duties and the nature of the ATP funding program;
4. Take any appropriate enforcement action as warranted by the findings.



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

May 6, 2026

Bryce Goldstein  
Via email: [bryce.goldstein@chicoca.gov](mailto:bryce.goldstein@chicoca.gov)

**Re: FPPC Complaint No. COM-05012026-01542; Bryce Goldstein**

Dear Bryce Goldstein,

The Enforcement Division of the Fair Political Practices Commission has received the enclosed sworn complaint that either named you as a respondent or included allegations against you. It appears the complainant is alleging you have violated the Political Reform Act's<sup>1</sup> conflict of interest provisions. The complaint and any attachments filed are enclosed. The complaint was filed against all those listed above, and was received by the Enforcement Division on May 1, 2026.

The person filing the Complaint is:  
Robert Berry

The violations alleged are:

*Conflict of Interest*

*General Rule (87100)*

*Council Member Goldstein held a leasehold interest in real property located within the project area at the time of her participation and vote. Under 2 CCR § 18702.2, a real property interest located within 500 feet of a project is presumed to be subject to a material financial effect. Given that the Respondent's leased office is located in the 100 block of Main Street, within the project boundaries, the presumption of materiality appears to apply. The project's scope—affecting access, traffic flow, parking, and surrounding infrastructure—creates a reasonably foreseeable potential for material financial effects on the value or utility of the leasehold interest. Despite this, Council Member Goldstein participated in discussions, publicly advocated for the project, and voted in favor of its approval. ... Council Member Goldstein is employed by the California Department of Transportation, which administers or is otherwise responsible for funding the ATP grant supporting the project.*

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

At this time, we have not made any determination about the allegation(s) made in the complaint. Within 14 calendar days from the date the complaint was received, the complainant will be notified of our intent to:

- investigate the allegations of the complaint;
- refer the complaint to another governmental agency;
- take no action on the complaint because, on the basis of the information provided, the Commission does not appear to have jurisdiction to investigate; or
- take no action on the complaint because the allegations of the complaint do not warrant the Commission's further action.

A copy of that letter will be forwarded to you. If you have any comments on the allegation(s), your comments must be submitted in writing directed to Katelyn Rader by email to [krader@fppc.ca.gov](mailto:krader@fppc.ca.gov). Please include the complaint number referenced above in your response.

Sincerely,

*Kendall L.D. Bonebrake*

Kendall L.D. Bonebrake  
Chief, Enforcement Division

KLDB: kjr

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the project, and voted in favor of its approval.

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