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August 14, 2012

Chair Ravel and Commissioners Eskovitz,  
Garrett, Montgomery, and Rotunda  
Fair Political Practices Commission  
428 J Street, Suite 600  
Sacramento, CA 95814

**Re: Agenda Item #26: Adoption of Amendment to Conflict of Interest Regulation 18706 – Support Staff Recommendation**

Dear Chair Ravel and Commissioners:

On behalf of California Common Cause and our 400,000 national members please accept this letter in support of the staff's recommendation to tentatively adopt the proposed regulations to Section 18706.

Commission staff has done considerable research and preparation prior to proposing these regulations and this can be seen through the extensive discussion presented in the staff memo. California Common Cause had expressed our concern at the Interested Person's meeting that drawing a "line in the sand" in conflict of interests' regulation should not be considered. The Commission's memorandum thoroughly explains the reasons why we believe drawing a strict "line" would have been mistaken policy.

Additionally, based on the supplemental memo written by the General Counsel, we urge the Commission to adopt subdivisions (a) and (b) on a tentative basis until such time that staff has presented the remainder of the regulatory package.

We look forward to working with the Commission staff on future regulations. Please contact me at (916) 520-4070 if you have any questions.

Sincerely,

Phillip Ung  
Policy Advocate