



# California POLICE CHIEFS Association Inc.

P.O. Box 255745 Sacramento, California 95865-5745 Telephone (916) 481-8000 FAX (916) 481-8008  
E-mail: [Imcgill@californiapolicechiefs.org](mailto:Imcgill@californiapolicechiefs.org) • Website: [californiapolicechiefs.org](http://californiapolicechiefs.org)

#### EXECUTIVE BOARD

President  
SCOTT R. SEAMAN  
Los Angeles Metro Sheriff  
Executive President  
KIM RANNEY  
Colton  
District President  
PETE DUNBAR  
Prescott Hill  
Vice President  
CHRIS BRYAN  
Chico Heights  
Immediate Past President  
DAVID I. MAGGARD JR.  
Folsom  
Director of Legal  
ROBERT LEHNER  
Elk Grove

#### DIRECTORS

Region 1  
TOM CHAPMAN, Anaheim  
Region 2  
PAUL NANFITO, Red Bluff  
Region 3  
JOE KREINS, Nevada  
Region 4  
ROBERT LEHNER, Elk Grove  
Region 5  
RON LAWRENCE, Rocklin  
Region 6  
WALLIS TIBBET, Fairfield  
Region 7  
DARY HAMPTON, Tracy  
Region 8  
SCOTT VENMEER, Marysville  
Region 9  
MARNY SOLANO, Watsonville  
Region 10  
JANE L. DAVIS, Colton  
Region 11  
MARG KRSTIC, Eureka  
Region 12  
REN CORNEY, Ukiah  
REGION 13  
SCOTT FICKSWILL, Lawton  
Region 14  
RICK HICKS, Placenta  
Region 15  
STEVEN JAY, Redding  
Region 16  
DAVID BEJAHANI, Ukiah  
Region 17  
ERIK BRAZIER, San Francisco  
Region 18  
JAMES LEAL, Newark  
Region 19  
SYLVIA MOIR, Eureka  
Region 20  
SAL BUSANI, Berkeley/Santa Rosa  
Region 21  
JACQUELINE STARBUCKS, Santa Maria  
Region 22  
CAMERINO SANCHEZ, Santa Barbara  
Region 23  
PAUL WALTERS, Santa Ana  
Associate Member  
MIKE CALADY, Deputy Chief  
San Mateo  
Associate Member  
KEITH FOSTER, Deputy Chief  
Fresno  
Associate Member  
CRASH HUNTER, Deputy Chief  
Anaheim  
Associate Member  
CESLIE MOORE, OAS  
Executive Director

May 14, 2012

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

**RE: May 17, 2012, FPPC Meeting, General Item 11: Proposed Cal. Codes Regulations., title 2, §18313.6 – Internet Posting of Elected Officials’ Personal Information.**

Dear Ms. Ravel:

The California Police Chiefs Association is submitting this comment on the Fair Political Practices Commission’s (FPPC) proposed Cal. Codes Regulations §18313.6, On-line Posting, Redacting Personal Information.

The California Police Chiefs Association is the primary provider of front-line law enforcement services in California. Our members protect 78% of Californians, including many of the elected officials who would be impacted by proposed Regulation 18313.6. Frankly, the public safety implications of this proposed regulation – in either of its proposed alternatives – raise serious public safety issues.

A requirement that elected officials post Form 700s on-line creates an elevated threat for that category of filers. For example, judicial officers (who will be decidedly impacted by this proposed Regulation), impose the final decisions on litigants: Depriving them of liberty, defining their visitation and custody rights with children, determining civil accountability, ruling on personal injury litigation, or interpreting contracts. The level of vitriol aimed at judicial officers is unhappily a fact of life. On average, a judicial officer in the United States is killed every 36 months; this underscores the very real risks faced by judges. As then-United States Supreme Court Chief Justice William Rehnquist noted, “trial judges in general are exposed to the criminal element in our society in ways . . . (others) are not.” Similarly, other civil judges (particularly Family Court judges) face significant threats against them as well.

The California Police Chiefs Association believes that it is the recognition of this reality on the federal side that accounts for the fact that no federal judges’ financial disclosures are posted on the Internet. As a matter of fact, the federal procedures allowing a person to gain access to a federal judge’s financial and personal disclosure are strict. These safe-guards include notice to the judge, a 5 day waiting period, and inspection of the form in-person only. Congress recognized the high

Ms. Ann Ravel  
May 15, 2012  
Page two

threat level presented to judicial officers by disclosure of their personal information. We believe that the federal model is the most prudent public safety approach.

The California Police Chiefs Association believes that the safety of judicial officers and their families would be well served by exempting judges completely from the FPPC's policy of posting Form 700s on the Internet. We believe that the current practice of filing a completed FPPC Form 700 locally and with the FPPC (without Internet posting) correctly balances the Commission's goal of transparency and access to information, against protecting elected judicial officials' security.

Thank you for considering the views of the California Police Chiefs Association.

Sincerely,

A handwritten signature in cursive script that reads "Scott R. Seaman". The signature is written in black ink and is positioned below the word "Sincerely,".

Scott R. Seaman  
President