

## Sasha Linker

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**From:** Cynthia Jones  
**Sent:** Thursday, September 07, 2017 3:46 PM  
**To:** CommAsst  
**Subject:** Regulation 18351

- Dear FPPC Commissioner Audero, Hatch and Hayward,

I am recommending that the FPPC Commissioners do not approve Regulation 18351 at this time. I would like to alert you the fact that your Regulation 18351 Fair Political Practices Commission's Conflict of Interest Code Amendment is flawed and concealed evidence of wrongdoing by the FPPC Human Resources Division. Complaints of illegal hiring practices, working out class, and merit issues was filed with the FPPC's Human Resources Division in July, 2017, and based upon Regulation 18351 Statement of Reason, again in August, 2017.

The Administration Division Chief reply failed to address any of the raised concerns but offer the following statements (multiple times) "There are remedies available to you to attempt address many of the issues you raise in your emails. If you would like to exercise those remedies, see the following for details..."

Below are a few of the agencies suggested that could respond to the concerns I raised.

- California Department of Fair Employment and Housing (DFEH).
- The State Personnel Board Appeals Division
- California State Auditor Whistleblower

The details of the complaints are on filed with Human Resources Division per the recommendation of the Administration Division Chief, the matter must be forward within 30 days from her response (dated 8/31/17); the matter has been forwarded. Perhaps the flowery language of the Conflict of Interest Code will have no bearing on its approval, nevertheless, in the Administration Division where 35% of the staff are managers, I find it alarming that responses must come from outside agencies.

Respectfully submitted,  
Cynthia Jones  
FPPC Legal Division  
Political Reform Consultant II, (18 yrs tenure)

Cc: Brian Lau