

## MEMORANDUM

To: Chair Ravel, Commissioners Garrett, Eskovitz, Montgomery and Rotunda

From: Lynda Cassady, Chief, Technical Assistance Division

Subject: Approval of Commission forms related to Form 700 disclosure. Form 804 lists disclosure obligations for individuals in new positions that are not yet designated in a conflict-of-interest code. Form 805 addresses disclosure requirements for consultants.

Date: September 8, 2011

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Attached for your approval are two forms related to disclosing financial interests for individuals serving as consultants and individuals recently hired into a new position not yet identified in an agency's conflict-of-interest code. These forms provide a uniform means to document the disclosure obligations of such positions. The information required to be disclosed is set forth in FPPC Regulation 18734.

The Commission held two public comment periods. Initially, one form was proposed. However, comments received indicated that the instructions and disclosure format would be easier to understand if there were separate forms. The most frequently asked question was whether the forms are mandatory or optional. Regulation 18734 sets forth the disclosure requirements for these positions but the regulation does not require agencies to use these specific forms. Staff incorporated technical changes suggested during the public comment periods. In general, agencies are very supportive of the FPPC developing these forms as it helps them to ensure their staff is correctly documenting disclosure information.

The following documents are attached:

Form 804: Agency Report of: New Positions  
Form 805: Agency Report of: Consultants  
Regulation 18734

I ask for your approval.

