

# Fair Political Practices Commission

## Memorandum

**To:** Chairman Ravel, Commissioners Casher, Eskovitz, Wasserman, and Wynne

**From:** Lynda Cassady, Division Chief, Technical Assistance Division

**Subject:** Adoption of Proposed Amendments to Regulation 18351 – Fair Political Practices Commission (FPPC) Conflict of Interest Code

**Date:** June 3, 2013

Proposed Commission Action and Staff Recommendation: Adopt amendments to Regulation 18351, the FPPC's conflict of interest code.

Reasons for Proposal: Pursuant to Section 87306, every state agency must amend its conflict of interest code when it creates new job classifications, revises job titles, or alters the scope of job duties for designated employees. Commission members approve amendments to the conflict of interest code before it is submitted to the Attorney General for final approval. The Attorney General is the code reviewing body for the FPPC's conflict of interest code.

Discussion and Summary of Proposed Actions: The FPPC's conflict of interest code is contained in Regulation 18351 which is attached to this memorandum. The proposed amendments to Regulation 18351 make the following changes to the conflict of interest code: (1) adds new positions; (2) reflects title changes to existing job classifications; (3) eliminates job classifications that no longer exist or which are no longer making or participating in governmental decisions; (4) revises disclosure categories for existing job classifications with expanded duties; and, (5) makes other non-substantive revisions to the conflict of interest code.

The reasons for the amendments are set forth in detail in the "Proposed Final Statement of Reasons," which is attached to this memorandum. During the public comment period, one comment was received and a minor revision to Category 3 was made. Political Reform Consultant, Alexandra Castillo was responsible for preparing the amendment.

In the past the Commission has approved the code before staff submits the code to the Attorney General for final adoption.

### **Attachments:**

**1 - Amendment to Regulation 18351**

**2 – Proposed Final Statement of Reasons**

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