

## Sasha Linker

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**From:** George Aradi  
**Sent:** Tuesday, November 08, 2022 9:11 AM  
**To:** CommAsst  
**Subject:** "Enforcement Policy Goals" Commission meeting 11/8/2022

Good Morning Committee Members-

George Aradi, Special Investigator, FPPC (since January 2014).

I was only notified of today's meeting yesterday, so please forgive me for not providing a more thorough review of the proposals by the Commission.

I have been a law enforcement officer since 1975. Without a doubt, the quest to bring cases to their logical conclusion is most difficult at the FPPC for several reasons:

- 1) Case load- I have 62 cases and the other 8 Investigators have about the same,
- 2) Attorney's have even more cases,
- 3) Complexity and ever changing laws and regulations the FPPC enforces.

Last year our leadership initiated a push to close older cases and established a timeframe to generally bring cases to their conclusion. This push, we have been told by management, yielded favorable results. It is my view that the current proposals are rather granular and can:

- 1) Lead to disproportionate focus on a "numbers game",
- 2) Give rise to staff anxiety; especially, the "Specific target deadlines" reflected in the proposal,
- 3) Result in misinterpretation of production data (missed deadlines) that can adversely reflect on staff performance.

The current performance evaluation protocols are mostly adequate except for the yearly evaluation by supervisors. I believe evaluations would be more effective if they were conducted quarterly and in-person, which can:

- 1) Render investigative, case resolution and time-management guidance to the Investigators and attorneys,
- 2) Identify obstacles to case resolution--- whether they are caused by a heavy case load, case complexity, inordinate or unprecedented legal challenges, or poor performance. Poor performance can mostly be readily identified by a supervisor by reviewing Salesforce records as well as during the quarterly in-person evaluations.

I am also curious whether the Commission had coordinated the new proposals with the respective unions representing the Enforcement Division.

In my view, this topic boils down to whether efficiency and production goals to can be achieved by increasing staff or through, what appears to be, a complex matrix of prescribed deadlines.

Sincerely,



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