

From: [Debra Black](#)
To: [Chloe Hackert](#)
Subject: Request to Continue Agency Use of Outside Filing Systems
Date: Tuesday, October 8, 2024 8:30:56 AM
Attachments: [Outlook-14lyvlki.jpg](#)
[Outlook-ck0ijbhq.png](#)
[Outlook-skd3moc5.png](#)
[Reply to New FPPC Ruling Regarding Form 700 Filing.pdf](#)

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EXTERNAL EMAIL

Good morning,

The attached request for your consideration.



dblack@sandimasca.gov

City Council

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Eric Nakano, Mayor Pro Tem – District 2
Rachel Bratakos - District 3
Ryan A. Vienna, - District 4
Eric Weber - District 1

City Manager

Chris Constantin

Assistant City Manager

Brad McKinney

City Attorney

Jeff Malawy

**Director of Administrative Services**

Michael O'Brien

Director of Community Development

Luis Torrico

Director of Parks and Recreation

Scott Wasserman

Director of Public Works

Shari Garwick

October 8, 2024

Subject: Request for Continuation of Agency-Specific Filing Systems for Statements of Economic Interests

Dear Chloe Hackert,

I hope this message finds you well. On behalf of the City of San Dimas, I am writing to request that agencies be allowed to continue utilizing their own established filing systems for Statements of Economic Interests (Form 700). We believe this flexibility will enable agencies to maintain the operational efficiency and integrity of their current processes.

While we understand the importance of standardization, we would like to highlight the potential impacts that could arise if a uniform filing system were to be mandated:

1. **Disruption of Existing Processes:** Many agencies, including ours, have developed systems tailored to our specific workflows and needs. Requiring a switch to a new system could disrupt operations and cause delays, particularly during the transition phase.
2. **Resource Demands:** Implementing a new filing system may require significant resources, including staff training, technical adjustments, and possibly additional technology investments, which could be a financial burden.
3. **Loss of Operational Efficiency:** A one-size-fits-all approach may not cater to the unique needs of each agency (such as more seasoned elected who file hard copies), potentially leading to inefficiencies or increased workload in managing these filings.
4. **Data Migration Risks:** Migrating to a new system always poses a risk of data loss, inconsistencies, or system errors, which could create compliance concerns or delays in processing.

Given these considerations, we respectfully request that agencies be granted the option to continue using their own filing systems while ensuring compliance with all legal and regulatory requirements. We believe this approach will allow for the smooth and effective management of Statements of Economic Interests without introducing unnecessary disruptions.

We are, of course, willing to discuss any additional steps needed to ensure consistency and transparency across agencies while maintaining flexibility in the filing process.

Thank you for your attention to this matter.

Mandatory FPPC 700 Filings thru FPPC System
October 8, 2024

2

Debra Black
City Clerk
City of San Dimas
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