

**STATEMENT OF REASONS IN SUPPORT OF ATTORNEY GENERAL  
APPROVAL OF PROPOSED AMENDMENTS TO CONFLICT OF INTEREST CODE  
FOR FAIR POLITICAL PRACTICES COMMISSION**

The Office of the Attorney General proposes to approve the following amendments to the conflict of interest code of the Fair Political Practices Commission (the “Commission) for the following reasons:

***Executive Office***

The position of Information Officer has moved to the Executive Office from the abolished External Affairs and Education Division to reflect the Commission’s current organization. The disclosure category for this position has changed from Category 3 to Category 1, the broadest disclosure category, because of the position’s ability to influence agency policy and actions in the Executive Office.

The position of Legislative Counsel is a newly created position. It has been assigned to Category 1, which is the same disclosure category applicable to other agency attorney positions.

***Former External Affairs and Education Division***

The Commission has abolished this division. The positions of Division Chief and Legislative and External Affairs Coordinator have also been abolished. Positions that were formerly in this division are now in the Legal Division, except that the position of Information Officer is now in the Executive Office.

***Legal Division***

The position of Staff Services Manager II has been abolished.

The positions of Staff Services Manager I and Staff Services Analyst/Assistant Political Reform Consultant are newly created and assigned to Category 3, which is the disclosure category assigned to all designated positions in this division that are not attorney positions. This disclosure category is narrowly tailored to economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

***Enforcement Division***

The positions of Supervising Management Auditor and Associate Government Program Analyst are newly created positions. These positions are assigned to Category 2, which is the disclosure category assigned to all designated positions in this division that are not assigned to Category 1. This disclosure category is narrowly tailored to real property and economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

The position of Staff Services Analyst (subpoena services) was renamed to Management Services Technician (subpoena services). The job duties of this position have not changed.

### ***Disclosure Categories***

Paragraph (D) of Category 3 was removed because the positions assigned this disclosure category no longer write formal advice letters.