

**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:

Cover Page

Standard language is added to the Cover Page. Electronic filing requirements for designated employees and members of the Commission are added to reflect recent changes to Government Code section 87500.

Executive Office

Legislative Counsel is retitled Legislative Counsel (All Levels) to be consistent with FPPC Counsel (All Levels). The duties of these positions have not changed.

Legal Division

Political Reform Consultants is retitled Political Reform Consultant (All Levels) to be consistent with FPPC Counsel (All Levels). The Legal Division has Political Reform Consultants at levels I and II. The duties of these positions have not changed.

Enforcement Division

Political Reform Consultants is retitled Political Reform Consultant (All Levels) to be consistent with FPPC Counsel (All Levels). The Enforcement Division has Political Reform Consultants at levels I and II. The duties of these positions have not changed.

Audits and Assistance Division

Senior Management Auditor is added. This is a new position and is assigned to Disclosure Category 2, which is consistent with the Supervising Management Auditor position and other positions in the Audits and Assistance Division other than the Division Chief. 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.

Administration and Technology Division

Staff Services Manager I (SSM 1) is retitled to indicate it applies only to the SSM I's in the Form 700 and Business Services units. SSM I's in the Form 700 and Business Services units are the only SSM I's in the Administrative and Technology Division that should be designated because the other SSM I in the Administration and Technology Division does not make, or participate in making, decisions that may foreseeably have a material effect on any financial interest. The duties of these positions have not changed.

Consultants/New Positions and Disclosure Categories

Standard language is added to the requirement for Consultants/New Positions. Minor updates are made to Disclosure Category 1 and Disclosure Category 4 to be consistent with the language used in other disclosure categories.