



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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September 29, 2016

Alice Reynolds
Deputy Secretary for Law Enforcement and Council
Office of the Secretary, California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

Re: Extension of Conflict of Interest Code Exemption

Dear Ms. Reynolds:

This letter grants an extension of the **California-Mexico Border Relations Council's** ("Council") exemption from the requirement to adopt a conflict of interest code under Regulation 18751.

Based on information discovered during the conflict of interest code adoption process, the Council has no "designated employees" within the meaning of Government Code Sections 82019 and 87302(a), and therefore is eligible for extension under California Code of Regulations Section 18751 subdivision (d)(1). The Council is made up solely of state agency secretaries and undersecretaries and the Council designees are the second in command at the state agencies – all of which have full, statewide disclosure and therefore are not required to be listed in a code under Regulation 18730(b)(3).

Under Regulation 18751(g), extensions expire after two years and agencies must adopt a conflict of interest code, request an extension of the exemption, or submit a new request for exemption. If the structure of the Council changes and the exception in Regulation 18730(b)(3) no longer applies, the Council may need to adopt a conflict of interest code or be added to another agency's conflict of interest code at that time.

If you have any questions, please feel free to contact me at 916-322-5660.

Sincerely,

/S/

Trish Mayer
Assistant Chief
Legal Division