



# California Fair Political Practices Commission

March 20, 1987

James E. Williams, Executive Director  
Sacramento Area Council of Governments  
106 K Street, Ste. 200  
Sacramento, CA 95814

Re: Your Request for Advice  
Our File No. A-87-067

Dear Mr. Williams:

This is in response to your letter asking whether Joe Benatar must file a statement of economic interests (Form 730) as an Alternate Director of the Sacramento Area Council of Governments (SACOG).

A review of SACOG's conflict of interest code indicates that Alternate Directors are required to file statements of economic interests disclosing all investments in business entities and sources of income which are located in or doing business in SACOG's jurisdiction, and all interests in real property located in or within two miles of SACOG's jurisdiction or within two miles of any land owned or used by SACOG. (Appendix to the Conflict of Interest Code for the Sacramento Area Council of Governments, copy enclosed.)

There appears to be nothing in the code which exempts Alternate Directors who have not actually served on the Council from the requirement to file disclosure statements. However, as a member of the Sutter County Board of Supervisors, Mr. Benatar is required under Government Code Section 87200 to file a statement of economic interests (Form 721) each year and he may complete one Form 721 and include all information required to be disclosed for both positions. He may then file that statement, including an original signature, with both Sutter County and SACOG. However, because his jurisdiction for reporting under Section 87200 is limited to Sutter County and the jurisdiction of SACOG appears to be much broader, Mr. Benatar may wish to file a separate Form 730 with SACOG.

If you have additional questions, please do not hesitate to contact me at (916) 322-5662.

Sincerely,

Diane M. Griffiths  
General Counsel

*Carla Wardlow*  
By: Carla Wardlow  
Political Reform Consultant

Enclosure



F P P C  
FEB 27 10 20 AM '87

**Sacramento Area  
Council of Governments**

106 "K" Street Suite 200  
Sacramento, California 95814  
(916) 441-5930

Mailing Address:  
P.O. Box 808  
Sacramento, California 95804

**Directors**

GEORGE DEVERAUX  
(Chairman)  
Chairman  
Yuba County

ROSS AINSWORTH  
Vice Mayor  
City of Rocklin

GEORGE P. DeMARS  
Chairman  
Yolo County

GUY GIBSON, JR.  
Vice Mayor  
City of Folsom

LAWRENCE MARK  
Vice Mayor  
City of Yuba City

DAVID NOFZIGER  
Vice Mayor  
City of Woodland

TOM PFEFFER  
Supervisor  
Sutter County

LYNN ROBIE  
Councilwoman  
City of Sacramento

DAVID E. ROLOFF  
Vice Mayor  
City of Marysville

JIM STRENG  
Vice Chairman  
Sacramento County

JAMES E. WILLIAMS  
(Executive Director)

**Members**

- City of Lincoln
- City of Rocklin
- City of Roseville
- Sacramento County
- City of Folsom
- City of Galt
- City of Isleton
- City of Sacramento
- Sutter County
- City of Live Oak
- City of Yuba City
- Yolo County
- City of Davis
- City of Winters
- City of Woodland
- Yuba County
- City of Marysville
- City of Wheatland

February 25, 1987

Betty Brown, Legal Documents Examiner  
Fair Political Practices Commission  
P.O. Box 807  
Sacramento, CA 95804

Dear Ms. Brown:

Enclosed is a copy of a letter from Alternate Director Joe Benatar regarding the need to file an Annual Statement due April 1, 1987.

We would appreciate your opinion as to whether or not he is required to file Statements of Economic Interests as an Alternate Director of the Sacramento Area Council of Governments.

Your prompt response will be appreciated.

Sincerely,

JAMES E. WILLIAMS  
EXECUTIVE DIRECTOR

JW:jrc  
Encls.

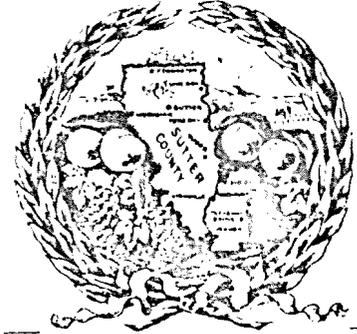
COUNTY OF SUTTER

BOARD OF SUPERVISORS

JOE BENATAR, DISTRICT 2

SUTTER COUNTY OFFICE BUILDING  
463 SECOND STREET  
YUBA CITY, CALIFORNIA 95991  
916-741-7106

RECEIVED  
FEB 13 1987



COPY OF STONE LITHOGRAPH  
ORIGINAL COUNTY SEAL.  
LATE 1800'S

February 12, 1987

SACOG  
106 K Street, Suite 200  
Sacramento, CA 95814

Attn: James E. Williams, Executive Director

Dear Mr. Williams:

I am in receipt of your memorandum dated January 29, 1987,  
with regard to filing Form 730, Statement of Economic Interest.

I was appointed to SACOG in the capacity as Alternate Director,  
but I never attended any meetings. Since I never assumed the  
position of serving, I did not file a 730 Form.

If you have any questions, please contact my office at (916)  
741-7106.

Sincerely,

Joe Benatar  
Supervisor, District Two

/jb



# California Fair Political Practices Commission

February 27, 1987

James E. Williams  
Sacramento Area Council  
of Governments  
P.O. Box 808  
Sacramento, CA 95804

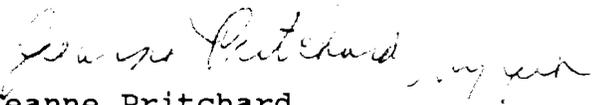
Re: 87-067

Dear Mr. Williams:

Your letter requesting advice under the Political Reform Act was received on February 27, 1987 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days. You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

  
Jeanne Pritchard  
Chief  
Technical Assistance and Analysis  
Division

JP:plh