



California Fair Political Practices Commission

December 10, 1987

Wayne K. Lemieux
Attorney at Law
Helm & Lemieux
141 Duesenberg Dr., Unit 5
Westlake Village, CA 91362-3416

Re: Our File No. I-87-286

Dear Mr. Lemieux:

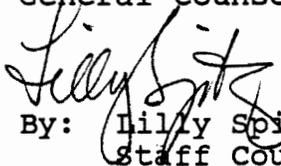
Your letter dated November 10th to Chairman Larson has been referred to me for response.

You are correct in your assertion that the Commission will now act as the code reviewing body for the Central Basin Municipal Water District due to its recent annexation of a small portion of Orange County. As you are obviously aware, the Commission is the code reviewing body for all local government agencies with jurisdiction in more than one county. (Government Code Section 82011(a).) This provision of the Political Reform Act eliminates any question as to the appropriate procedures for review of local conflict of interest codes for public agencies falling within more than one jurisdiction.

We feel that to amend the law or to provide exceptions through regulation would only create, rather than reduce confusion. If there are any specific questions you feel the local officials within the jurisdiction of the water district would like answered by the Commission relative to the local code, we would be happy to respond.

Sincerely,

Diane Griffiths
General Counsel


By: Lily Spitz
Staff Counsel

Law Offices of

HELM & LEMIEUX

A PROFESSIONAL CORPORATION

WAYNE K. LEMIEUX

OF COUNSEL

RICHARD HAMLISH

141 DUESENBERG DRIVE, UNIT 5
WESTLAKE VILLAGE, CALIFORNIA 91362-3416

(805) 495-4770

(818) 448-8128

November 10, 1987

Mr. John Larson
Executive Director
Fair Political Practices Commission
428 "J" Street, Suite 800
Sacramento, CA 95814

**CONFLICT OF INTEREST DISCLOSURE:
CENTRAL BASIN MUNICIPAL WATER DISTRICT**

As a result of a recent annexation, the Central Basin Municipal Water District now includes approximately 1.6 acres of territory within Orange County. The District will begin dealing with the Fair Political Practices Commission as a multi-county agency. The multi-county provisions of the Political Reform Act probably should not be applied under such circumstances. Local officials will be confused because the Orange County part of the District is obscure. The FPPC will be given unnecessary added responsibility. Would the FPPC be interested in adopting a regulation or sponsoring legislation to address this issue?

I trust you continue to find your post interesting and challenging. Hope you are well. Promise to visit next time I can't avoid a trip North.

HELM & LEMIEUX


Wayne K. Lemieux

WKL/mo

cc: John G. Joham, Jr.

87-286

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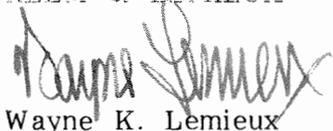
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Wayne K. Lemieux

WKL/mo

cc: John G. Joham, Jr.



California Fair Political Practices Commission

November 18, 1987

Wayne K. Lemieux
141 Duesenberg Drive, Unit 5
Westlake Village, CA 91362-3416

Re: 87-286

Dear Mr. Lemieux:

Your letter requesting advice under the Political Reform Act was received on November 12, 1987 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact Lilly Spitz, an attorney in the Legal Division, directly at (916) 322-5901.

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 if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Adm. Code Sec. 18329).)

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,

Diane M. Griffiths
by *Ked*
Diane M. Griffiths
General Counsel

DMG:plh