



# California Fair Political Practices Commission

March 8, 1989

Lucille Bourbeau  
925 Sonoma Avenue  
Modesto, CA 95355

Re: Your Request for Advice  
Our File No. I-89-127

Dear Ms. Bourbeau:

You have written requesting information regarding disclosure requirements for candidates for the Grand Jury. Since you have not requested advice on your behalf or at the request of an official with duties under the Political Reform Act (the "Act")<sup>1/</sup> we are treating your request as one for informal assistance.<sup>2/</sup>

Under the provisions of the Act, local agencies are required to promulgate conflict of interest codes. (Section 87300.) The conflict of interest codes must enumerate the positions within the agency which may materially affect financial interests. Financial disclosure requirements for said positions must also be enumerated. (See Section 87300(a) and Regulation 18730, copies enclosed.)

Grand juries are local government agencies and are therefore subject to the disclosure requirements of the Act. (See Whittington Advice Letter, No. A-85-185, copy enclosed.)

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<sup>1/</sup>Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

<sup>2/</sup> Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

Lucille Bourbeau  
March 8, 1989  
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Please do not hesitate to call me at (916) 322-5901 if you have further questions.

Very truly yours,

Diane M. Griffiths  
General Counsel

  
By: Blanca M. Breeze  
Counsel, Legal Division

DMG:BMB:ld

Enclosure

FEB 1 6 48 AM '89

925 Sonoma Avenue  
Modesto, California 95355  
January 29, 1989

Mr. John H. Larson, Chairman  
Fair Political Practices Commission  
428 J Street #800  
Sacramento, California 95814

Dear Sir:

Late last year a friend of mine was a candidate for the 1989 Grand Jury of Stanislaus County. This individual was quite outraged about forms which required disclosure of finances and business transactions.

This person asked me to inquire about the matter. I wrote a letter to our Board of Supervisors. It took a while and then I had a call from our County Attorney. I could accept his explanation except for one thing. That was that this type of inquiring was started at the behest of the Fair Political Practices Commission.

I cannot see the connection. The Grand Jury should not be political, the powers that be would insist that it is not, so where do you fit in and why?

My friend refused to complete the process. Had I been a candidate, I also would have refused.

Sincerely,

*Lucille Bourbeau*

Lucille Bourbeau

# Memorandum

To : Diane Griffiths

Date : February 6, 1989

From : John H. Larson  
FAIR POLITICAL PRACTICES COMMISSION *JHL*

Subject : Letter received from Lucille Bourbeau

Attached hereto is a letter from Lucille Bourbeau. Could you please prepare a response.

Attachment

FD-36

Feb 1 8 46 AM '89

925 Sonoma Avenue  
Modesto, California 95355  
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*Lucille Bourbeau*

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