



FAIR POLITICAL PRACTICES COMMISSION

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September 4, 2015

Brian Hildreth
o/b/o Janet Nguyen
Orange County Board of Supervisors
CalOptima
Bell, McAndrews & Hiltachk, LLP



Re: Closure Letter
FPPC No. 13/0237: Janet Nguyen ✓

Dear Mr. Hildreth:

The Fair Political Practices Commission (the "Commission") enforces the provisions of the Political Reform Act (the "Act")¹. As you are aware, the Commission initiated an investigation into whether your client violated the Act's conflicts of interest provisions specified in Government Code Section 84308 based on findings that were published in the Orange County Grand Jury Report-CalOptima.

Our investigation revealed that as a Member of the CalOptima Board, your client was an officer of an agency under Section 84308. However, for Section 84308 to apply, the decisions must be in proceedings involving a license, permit, or other entitlement for use pending before the agency, as defined by Section 84308 and its companion regulations. None of the decisions reviewed during our investigation were in proceedings involving a license, permit, or other entitlement for use pending before the CalOptima board. Therefore, we have closed our file in this matter.

If you have any questions regarding this matter, please feel free to contact me at



Sincerely,



Michael W. Hamilton
Commission Counsel
Enforcement Division

¹The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.