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KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 383
LOS ANGELES, CALIFORNIA 90012
(213) 974-1411 • www.bos.lacounty.gov

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May 19, 2022

Richard C. Miadich, Chair
Fair Political Practices Commission
1102 Q Street, Suite 300
Sacramento, CA 95811

Dear Chair, Miadich:

Suggested Changes to Proposed Regulations 18115

Our office is the filing officer for Statements of Economic Interests filed by Los Angeles County officials and by officials of over four hundred local public agencies in the county. We appreciate this opportunity to suggest changes to the above-named proposed regulation that your Commission will consider on May 19, 2022.

Our suggested changes are as follows:

Reg. 18115. Duties of Filing Officers and Filing Officials – Statements of Economic Interests

With regard to the duties of the filing official under (a)(3) and (a)(4), we strongly suggest that the following proposed language be revised to include the phrase “if available”.

- On Page 2, line 1 thru 2: At least one such notification shall be sent to the filer’s personal email or personal mailing address–, ***if available.***
- On Page 2, line 6: including, ***if available,*** the filer’s personal email or personal mailing address, and telephone number,

Presently, such personal information is not required to be provided by a filer and may not be information that can be obtained, especially for filers who have left office. Typically, filers are encouraged to provide their agency, municipal or business email or

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physical addresses on their statements and not their personal email or physical addresses. Additionally, the SEI Form 700's verification section also recommends the use of business or agency (and not personal) contact information.

In Los Angeles County, it's been our practice to only try to obtain personal contact information after attempts have been made to a filer's affiliated public agency address. It becomes very difficult for a Joint Powers Authority's Filing Officer to obtain an outgoing city councilmember's personal contact information from a City Clerk's office. We often sense the reluctance on their part to provide it and are told that the public official has left the city without providing any forwarding information.

Without the added revisions, we believe that filing officers would not be able to comply with this regulation and would be hampered from requesting amendments and submitting enforcement referrals. Furthermore, we believe that those filers attempting to avoid completing a statement will benefit from the filing officers' inability to submit a referral.

I plan to participate in today's Commission meeting. I can be reached at (213-974-1578). I would be happy to answer any questions you might have about our suggested revisions.

Very truly yours,

Don Garcia

Don Garcia
Chief, Conflict of Interest/Lobbyist Division

c: Edward Yen, Assistant Executive Officer
Doreen Losoya, Acting Deputy Executive Officer