Mia Martinez, President (Ventura)
Ryan Sharp, Vice-President (San Diego)
Stefany Blankenship, Treasurer (Shasta)

800 S. Victoria Avenue, L#1920
Ventura, CA 93009
Phone: (805) 654-2566
President@ccbsa.info

August 12, 2026

Fair Political Practices Commission
1102 Q Street, Suite 3050
Sacramento, CA 95811

Subject: Opposition to Proposed Amendments to Regulation 18723.1 (Statement of Economic Interests Filing Requirements)

Dear Chair Silver and Commissioners Brandt, Ortiz, and Wilson:

I am writing on behalf of the California Clerk of the Board of Supervisors Association (CCBSA) to respectfully express opposition to the proposed amendments to Regulation 18723.1 relating to Statement of Economic Interests (Form 700) filing requirements for officials holding multiple positions, as discussed in the FPPC's June 2026 pre-notice staff memorandum.

While we appreciate the Commission's efforts to simplify and clarify disclosure obligations for multi-position filers, the proposed revisions, specifically the removal of requirements for 87200 filers to (1) identify code-designated positions when filing an Expanded Statement, and (2) provide a copy of the Expanded Statement to relevant code agencies, create significant and consequential challenges for local government agencies charged with ensuring compliance under the Political Reform Act.

Below are several concerns of the CCBSA:

1. **Reduced Transparency and Loss of Agency Oversight**
   Eliminating the requirement that 87200 filers list additional code positions on their Expanded Statement would substantially diminish local transparency. Agencies such as counties, which oversee numerous designated positions under conflict-of-interest codes, rely on these listings to verify that an official's filing reflects all roles subject to disclosure. Without these disclosures, local agencies would be unable to confirm compliance without manually searching FPPC filings for each individual filer, an inefficient and error-prone substitute for direct reporting.

2. **Increased Operational and Administrative Burdens**
   The proposed changes shift compliance responsibility from filers to local agencies, compelling agencies to undertake labor-intensive monitoring of FPPC filings. This

added burden is especially acute in jurisdictions with large numbers of code-designated positions or overlapping service on regional boards, commissions, and county entities.

3. **Significantly Increased Risk of Erroneous Non-Filer Reporting**
Because of the reduced oversight and increase administrative impact on agencies, the proposed amendments would substantially increase the likelihood that agencies mistakenly report officials as non-filers. Without timely access to jurisdiction-specific filings, agencies may be unable to verify whether an official has already filed with the FPPC. This lack of visibility heightens the probability of incorrect non-filer referrals to the FPPC—referrals that could have been avoided under the current, clearer reporting structure. Such unwarranted referrals would also place an unnecessary burden on the FPPC enforcement division, which would be required to investigate matters that stem solely from reduced transparency and reporting gaps rather than actual non-compliance.

4. **Heightened Risk of Incomplete or Missed Filings**
Under the proposed amendments, filers who serve simultaneously in multiple jurisdictions may inadvertently omit positions if they fail to identify the proper jurisdiction in their Expanded Statement. Without copies sent to the code-designated agency, errors may go unnoticed until a conflict issue arises, undermining public trust and potentially exposing agencies to accountability concerns.

5. **Undermining the Purpose and Intent of the Political Reform Act**
The Political Reform Act prioritizes transparency, public confidence, and clear disclosure of financial interests across all positions held by public officials. Filing Agencies continue to emphasize the importance of clarifying SEI requirements for officials holding multiple positions. The proposed amendments, however, would impede these goals by reducing clarity for agencies rather than enhancing it.

6. **Concerns About Enforcement, Uniformity, and Consistency**
Regulation 18723.1 currently creates a structured and consistent process for multi-position filing. Removing essential reporting components would result in inconsistent practices, diminished oversight capacity, and added confusion for filers who may misinterpret whether secondary positions require disclosure.

For these reasons, we respectfully request that the Commission **retain the existing requirements** that an 87200 filer must identify all additional code agency positions on an Expanded Statement and provide a copy of that Expanded Statement to each applicable agency. These provisions are essential for preserving standardized filing practices, ensuring statutory compliance, and maintaining the public's trust in transparent governance.

Thank you for the opportunity to comment. We appreciate the Commission's continued leadership and openness to stakeholder feedback. If you have any questions, please contact CCBSA Legislative Committee Chair Andrew Potter at andrew.potter@sdcounty.ca.gov or via phone at (619) 531-5434.

Sincerely,

Mia Martinez
Chief Deputy Clerk of the Board of Supervisors, County of Ventura
2026 President, California Clerk of the Board of Supervisors Association (CCBSA)