

September 16, 2026

Fair Political Practices Commission
Attention: Chair Silver and FPPC Commissioners
1102 Q Street, Suite 30002
Sacramento, CA 95811

RE: Proposed Amendments to Regulation Section 18723.1 – Expanded Economic Interest Statements

Dear Chair Silver and Commissioners:

We appreciate the opportunity to provide comments on the proposed amendments to Regulation 18723.1 regarding Statements of Economic Interests (SEIs) for public officials holding multiple positions. We recognize the Commission's continued efforts to provide clarity and uniformity in the administration of the Political Reform Act.

Our comments are specifically focused on the application of these amendments to local elected officials and other local filers. We recognize that the proposed framework may operate differently at the state level, particularly for elected state officers whose financial disclosure obligations and public access to those filings are centralized with the Commission. However, we are concerned that applying the same approach to local officials may have unintended consequences for local transparency, filer compliance, and the statutory and regulatory responsibilities of local filing officers.

Greater Risk of Filing Errors and Amendments

The proposed approach may increase the potential for filing errors and create additional complexity for local filers. An official whose Code-designated position is with an agency that has a broader geographic jurisdiction than the official's Section 87200 position must still ensure that the filing properly accounts for the broader jurisdiction and satisfies the applicable disclosure requirements. As the rules governing when a position must be separately identified or filed become more nuanced, a filer could inadvertently fail to identify the appropriate position or jurisdiction, particularly when relying on a single Expanded Statement to satisfy multiple filing obligations.

The issue is further complicated because not all filing obligations necessarily follow the same process. Assuming office and leaving office statements may still be required to be filed separately with the agency for the Code-designated position. If the Code-designated position or applicable jurisdiction is not clearly identified on the Expanded Statement, and the local filing officer does not receive a copy or other reliable notification of the filing, there may be no readily apparent way for the local filing officer to determine whether the filer has fully satisfied each applicable obligation.

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This creates a risk that an omission or incorrect filing may not be identified until well after the filing deadline. The local filing officer may then need to contact the filer, research filings maintained by the Commission or other agencies, determine which positions and jurisdictions were intended to be covered, and potentially request an amended filing. Rather than simplifying compliance, this can create additional administrative work after the fact and uncertainty for both the filer and the filing officer as to whether the filing obligation was properly satisfied.

Maintaining clear identification of all positions and jurisdictions on an Expanded Statement and filing it with the local filing official provides an important safeguard against these errors. It allows both the filer and the filing officer to confirm, at the time of filing, which positions the statement is intended to cover and whether any additional filings remain necessary. This position-level information is particularly valuable in a regulatory framework where the filing requirements may differ depending on the type of position, geographic jurisdiction, disclosure requirements, and filing officer.

Impact on Local Filing Officers

The proposed amendments also creates significant implementation questions for local filing officers.

Local filing officers are responsible for administering their agencies' Conflict of Interest Codes and identifying designated filers, communicating filing requirements, tracking compliance, reviewing filings as required, assisting filers, and providing public access to disclosure records.

When an Expanded Statement identifies and is filed with local filing officers they receive or has notice of the filing, there is a clear connection between:

the position identified in the agency's Conflict of Interest Code → the individual occupying that position → the filing obligation → and the Form 700 satisfying that obligation.

Removing local notification does break that administrative chain.

A local filing officer may instead have to determine whether an individual who appears not to have filed locally actually holds another qualifying 87200 position; locate that individual's filing through the Commission; determine whether the jurisdictional requirements for the filing exception are satisfied; determine whether the Commission filing encompasses the applicable local obligation; and reconcile that information against the agency's own filer records. This process becomes even more challenging when the local filing officer is not aware of all other agencies or public bodies on which the individual serves, particularly if those additional positions could no longer be identified in the Expanded Statement. It may also be difficult to confidently identify the correct filer when individuals have common or identical names—for example, multiple filers named "John Smith"—and the filing itself does not identify the local position or agency that would otherwise allow the filing officer to confirm the individual's identity and connect the filing to the applicable local filing obligation. In practice, removing position-level information can therefore make what appears to be a streamlined filing process more difficult for local filing officers to verify and administer.

Additionally, this does not necessarily eliminate administrative work. It can instead shift that work from the filer to the local filing officer while making the compliance determination less apparent.

We appreciate that the Commission's staff report itself recognizes this concern, noting that local filing officers may need to independently search Commission records, locate a filing, reconcile the filing against their own list of Code-designated positions, and determine whether the filing appropriately covers the applicable position and jurisdiction. The report further acknowledges that these concerns also apply to 87200 filers who hold Code-designated positions in jurisdictions that are the same as or smaller than the 87200 agency.

Potential for Filer Confusion

We are also concerned about how these requirements will be communicated to local filers.

A local official could hold several reportable governmental positions, but only some may need to appear on an Expanded Statement depending upon the nature of the position, geographic jurisdiction, disclosure requirements, and applicable filing officer.

While these distinctions may have a legal basis, they are difficult to translate into simple and consistent instructions for filers.

This is particularly challenging because local filing officers have already been communicating and implementing significant recent changes to Form 700 filing requirements.

Preserving Local Transparency While Streamlining Filing

We support efforts to streamline Form 700 filing and reduce unnecessary duplication. We also recognize that a centralized electronic filing model may provide significant efficiencies, particularly at the state level.

For local government, however, streamlining should preserve a reliable connection between the financial disclosure, the local governmental position, and the local agency responsible for administering its Conflict-of-Interest Code.

Ideally, a filer holding multiple positions should be able to submit one Expanded Statement electronically, identify all applicable governmental positions and jurisdictions, and have the system automatically provide the appropriate local filing officers with notice that the filing has been completed and which local filing obligations it satisfies.

Such an approach would achieve the Commission's goal of reducing duplicative filing without eliminating position-level transparency or shifting the responsibility for identifying and reconciling filings to local filing officers.

Until such functionality is available, we respectfully request that the Commission maintain the identification of applicable local positions and appropriate local filing or notification requirements and no further clarifications be made at this time.

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A simpler alternative would be to just have these amendments apply to “State Elected Officials.”

If the Commission proceeds with the proposed amendments to apply to all 87200 filers, we request that the training and educational materials that will be updated to reflect these regulatory changes and provide implementation guidance specifically address local government administration, including:

- how local filing officers should identify officials whose local filing obligation is satisfied through another filing;
- how filing officers should reconcile Commission filings against their Conflict-of-Interest Codes and filer lists;
- how filing officers should distinguish a legitimately consolidated filing from a non-filer;
- how assuming-office, annual, and leaving-office obligations should be tracked when a local position does not appear on the Expanded Statement;
- what information local agencies should provide to members of the public seeking Form 700 information for local officials who may only be required to file with the State; and
- how local agencies should communicate these changes to filers who have historically been instructed to identify all applicable positions on an Expanded Statement.

We respectfully encourage the Commission to preserve the ability of local filing officers and members of the public to readily identify which local governmental positions are covered by a Form 700 filing, while continuing to pursue technological solutions that reduce duplicative filings.

Thank you for considering the perspective of local filing officials and the practical implementation impacts of these proposed amendments. Please do not hesitate to contact us if we can provide additional information or support.

Respectfully submitted,



Diana Fuentes
City Clerk
City of San Diego