

Memorandum

To : Mssrs. Jack Gordon and Noel Robinson,
Representatives of the Franchise
Tax Board before the Fair Political
Practices Commission on the Review of the
Conflict of Interest Code of the
Franchise Tax Board

Date : September 27, 1976

M-76-569

From : FAIR POLITICAL PRACTICES COMMISSION - Delbert L. Spurlock, Jr., Chief
Conflicts of Interest Division

Subject: Conflict of Interest Code of the Franchise Tax Board

The proposed Conflict of Interest Code of the Franchise Tax Board has been revised and approved by the Fair Political Practices Commission pursuant to Government Code Section 87303(b). The Commission revisions to the proposed Code are in conformity with the proposed staff amendments contained in a memorandum from Delbert Spurlock to Commission members of the Fair Political Practices Commission dated September 15, 1976 (amending previous memoranda on the same subject) except that, in addition, the Commission deleted from the "Category II" of designated positions on Page 3 of the proposed Code the positions of:

- (1) "Tax Auditor I, FTB", and
- (2) "Tax Representative Trainee".

The complete revised Code as approved by the Commission is attached.

I thank both of you, other members of the staff, and the Board for undertaking the arduous task of "being first" and helping my staff in resolving many of the difficult issues which faced us at the beginning of this process.

If you have any questions, please feel free to contact me at 322-6444.

DLS:ma

Attachment

Memorandum

To : Mr. Charles C. Haskins
Chief Deputy State Treasurer

Date : September 28, 1976

76569

From : FAIR POLITICAL PRACTICES COMMISSION - Edgar A. Kerry, Staff Attorney
Conflicts of Interest Division

Subject: Approval, as Revised, of Conflict of Interest Code of the
Office of the State Treasurer

I. The proposed Conflict of Interest Code for the State Treasurer's Office has been revised and approved, as revised, by the Fair Political Practices Commission pursuant to Government Code §87303(b). The Commission's revisions are in conformity with proposed staff amendments contained in the memoranda dated September 14 and 22, 1976, from Ed Kerry to the members of the Fair Political Practices Commission. In addition, the Commission made the following revisions:

A. Inserted the words "including loans" after the word "income" in each subparagraph of Section VI (see revision (12), attached); and

B. Inserted the words "with any water, irrigation, sewage or other district whose issuance of bonds or other securities is subject to the approval of", at page 5, Section VI, A Designated Employee in Group C, line 6 (see revision (12), attached).

II. A copy of your revised and approved Code, with attached revisions, is enclosed. Unfortunately, due to staff limitations we are unable to retype your Code with the revisions incorporated. This is left to your own agency to complete.

III. Pursuant to Government Code §11422, your Code will become effective on the 30th day after its date of filing with the Secretary of State. To coordinate the date for filing initial statements of economic interests under your Code, with the date selected (January 31st) for filing annual statements thereafter, you might wish to file your Code with the Secretary of State on or about December 2, 1976. Your Code will then be effective January 1, 1977; your "designated employees" will file initial statements within 30 days (by January 31, 1977), and annual statements will be filed each January 31 thereafter.

Charles C. Haskins
September 28, 1976

Page Two

If you file your Code with the Secretary of State prior to the above recommended date (December 2, 1976), your "designated employees" will have a double filing requirement within a very short time period. They will be required to file initial statements within 30 days after the effective date of your Code, and they will be required to file annual statements shortly thereafter, on January 31, 1977. To avoid this unnecessary burden on your "designated employees", the filing of your Code with the Secretary of State on or about December 2, 1977, is recommended.

IV. If I can be of further help to you, please feel free to contact me at 322-6444.

EAK:mra
Attachments

