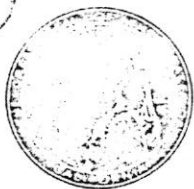


# State of California



# Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 ••• 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance/Administration . . . Executive/Legal . . . Enforcement/Conflict of Interest  
(916) 322-5660 322-5901 322-6441

March 8, 1976

Mr. John S. Gibson, Jr.  
Councilman, 15th District  
Room 375, Los Angeles City Hall  
Los Angeles, Ca. 90012

*A-76-608*

Re: Request for Opinion  
No. 76-026

Dear Mr. Gibson:

Thank you for your letter of February 19, 1976, requesting an opinion regarding the appropriate code reviewing body for the Housing Authority and Community Redevelopment Agency of the City of Los Angeles. Because your letter raises no substantial question involving an interpretation of the Political Reform Act, no formal opinion will be issued. However, I hope the following informal comments will be helpful.

Although a Housing Authority or Community Redevelopment Agency may be a state agency for some purposes, Winkelman v. City of Tiburon, 32 Cal.App. 3d 834, 846 (1973), for purposes of the Political Reform Act they are not state agencies. See FPPC Regulation 2 Cal. Adm. Code Section 18249 defining state agency. These agencies are city agencies because they operate exclusively within the City of Los Angeles. Moreover, their members are appointed by the mayor, subject to confirmation by the city council. Accordingly, the city council is the code reviewing body for the Conflicts of Interest Codes of both agencies.

If you have any questions, please contact Ken Goshorn, an attorney in the Conflict of Interest Division.

Sincerely,

Daniel H. Lowenstein  
Chairman,  
For the Commission

DHL:pvp

