

# State of California

A-78-069



# 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		322-6444

May 18, 1978

Mr. William F. Wilson  
 District Superintendent  
 Pierce Jt. Unified School District  
 Anaheim, California 95912

Dear Mr. Wilson:

This is in response to your letter of April 27, 1978, to Michael Bennett, in which you expressed your district's understanding that school district board members are exempt from filing Statements of Economic Interests.

Under the Political Reform Act, Government Code §81000, et seq., school districts are specifically listed among those agencies which are required to adopt Conflict of Interest Codes. Section 87300 provides in part that "Every agency shall adopt and promulgate a Conflict of Interest Code...". The term "agency" is defined in §82003 to include "... any ... local government agency...". Section 82041 defines "local government agency" to include "a district of any kind including school district...".

The required provisions of a Conflict of Interest Code are specified in §87302. Subsection (b), in particular, provides that each Code shall contain provisions that each employee designated therein shall be required to file Statements of Economic Interests. Thus, under the foregoing sections, it is clear that school board members are required to file Statements of Economic Interests pursuant to a Conflict of Interest Code adopted by the school district.

William E. Wilson  
May 18, 1978  
Page Two

As noted in our letter to your district dated March 31, 1978, we have not yet received a copy of your district's Code. We again request that your district take steps to adopt a Code and send a copy to our office for approval. I have enclosed copies of two model Conflict of Interest Codes whose format have been adopted by most school districts for whom the FPPC is Code reviewing body. We would be happy to assist you in developing a Code for your district by providing technical assistance if you so desire.

Thank you for your cooperation.

Sincerely,

*Ted Prim*

Ted Prim, Chief  
Conflicts of Interest Division

TP:gb  
enclosures

CORRESPONDENT William Wilson - <sup>Pierce Point</sup> Hon. Sec. Dist. DATE REC'D. 5-1

DATED 4-27 RE: Stmnt. of Econ. Ints. - sch. ad. mbrs.

ADMINISTRATION

BOB T.  
LINDA  
JUDY

CONFLICTS

TED  
DWIGHT  
KEN G.

ENFORCEMENT

FRED  
ROGER  
BOB G.  
JIM

78169

EXECUTIVE

DAN  
MICKEY  
CARLA  
JEANNE  
BOB S.  
SARAH

LEGAL

KEN F.  
NATALIE  
BARBARA  
MIKE  
LEE

T&A

JOHN K.  
GINA S.K.  
MARYANN  
 GINA T-orig  
ALICE  
BERMA  
JOHN G.  
JAY  
ALAN  
NAN-L.A.  
HELEN-L.A.

INFORMATION REQUEST FOR ADVICE--MUST BE ANSWERED WITHIN 21 DA

, PLEASE:

- TAKE WHATEVER ACTION YOU CONSIDER APPROPRIATE
- REPLY DIRECT BY \_\_\_\_\_ --COPY TO \_\_\_\_\_
- PREPARE SUGGESTED REPLY AND RETURN TO \_\_\_\_\_
- COORDINATE REPLY WITH \_\_\_\_\_

*Transmittal of Advice*

# Pierce Joint Unified School District

District Superintendent

*William E. Wilson*

Pierce High School

*William E. Wilson, Principal*

*Gregg LeMaster, Vice-Principal*

Arbuckle Elementary

*Thomas F. Hamilton, Principal*

Dunnigan Elementary

*Carolyn Reiff, Principal*

Grand Island Elementary

*Ivan J. Hansen, Principal*

ARBUCKLE, CALIFORNIA 95912

(916) 476-2892

APR 27, 1978  
MAY 1 9 05 AM '78

Trustees

President

*Joe Kalfsbeek*

Vice-President

*Gregory Ramos*

Clerk

*Charles E. Kelley, Jr.*

Members

*John S. Abele*

*John Miller*

Mr. Michael Bennett, Executive Director

Fair Political Practices Commission

P. O. Box 807

Sacramento, California 95804

Dear Mr. Bennett:

It has been our understanding that the board members of school districts are exempt from filing economic interest statements.

However, the board members on the above letterhead have no economic interest that conflicts with school business, nor do I.

Sincerely,



William E. Wilson

District Superintendent

WEW:1