

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 322-6444

July 28, 1978

A-78-322

Francis Chin
Bay Area Rapid Transit
800 Madison Street
Oakland, CA 94607

Dear Mr. Chin:

This letter will confirm our telephone conversation of July 27, 1978. You asked under what circumstances must a designated employee disclose his interest in a mutual fund.

I advised you that designated employees who own less than 10% of a mutual fund need not disclose their interest in the fund unless the employee's disclosure category specifically includes mutual funds as a type of investment which he is required to disclose. If the designated employee owns 10% or more of the mutual fund, he must disclose those holdings of the mutual fund in which he has a pro rata share of \$1000 or more and which are the types of investments described in his disclosure category.

If I may be of further assistance, please do not hesitate to contact me.

Sincerely,
Ted Prim
Ted Prim, Chief
Conflicts of Interest Division

TP:nw