

State of California



Fair Political Practices Commission

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September 15, 1980

Stan Ulrich
California Law Revision
Commission
4000 Middlefield Road, Room D-2
Palo Alto, CA 94306

A-80-09-048

Dear Stan:

This letter will confirm our telephone conversation of September 12, 1980. At its meeting of September 5, 1980, the Conflicts of Interest Committee of the Fair Political Practices Commission recommended to the full Commission that the Conflict of Interest Code of the Law Revision Commission be approved with the changes noted in the copy attached to my memorandum of August 26, 1980, with the following exception. They did not recommend to the Commission that the provision be included which required an annual update of the disclosure category before any work could begin on a topic. The Committee felt that this annual review was superfluous as the Political Reform Act requires all agencies to amend their Codes when change is necessitated by changed circumstances. See Government Code Section 87306. Therefore, if in the future the Law Revision Commission begins to consider a topic which could affect a type of interest which is not currently in Category 1, that Category must be amended by the Law Revision Commission within 90 days of the beginning of their consideration of the topic. They also asked me, however, to discuss with you whether Category 1 in the Code covered the kinds of entities which could be affected by the Law Revision Commission's topics over the course of the past few years, rather than simply the last year. In our conversation you confirmed that the topics generally stretched over several years and that the list as currently written already covers all the kinds of interests which could have been affected by your topics over the past few years. We therefore agreed that the list would not need to be expanded before the Code goes into effect.

Finally, my memorandum raised the question of whether or not the people who conduct studies on a topic under contract

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should be designated in the Code as consultants. The Committee did not recommend such designation to the full Commission.

If you have any further questions, please do not hesitate to call me again.

Sincerely,



Sarah T. Cameron
Deputy Chief for
Conflicts of Interest
Legal Division

STC:nrw