



# California Fair Political Practices Commission

July 18, 1990

Melvin Shapiro  
3786 Alabama Street, B-306  
San Diego, CA 92104

Re: Your Request for Informal Assistance  
Our File No. G-90-354

Dear Mr. Shapiro:

We have received your letter dated May 16, 1990 seeking advice concerning the financial disclosure obligations under the Political Reform Act ("the Act")<sup>1</sup> of attorneys retained by the city's housing commission.

As was indicated to you previously in your telephone query, we are unable to provide you with advice. Under Regulation 18329, copy enclosed, the Fair Political Practices Commission is authorized to provide advice to any person whose duties under the Act are in question. (Regulation 18329(b)(1), 18329(c)(1).) We cannot provide advice about another person's duties. (Regulation 18329(b)(8)(B), 18329(c)(4)(C).)

You have asked for copies of prior Commission advice letters which have addressed the issue of financial disclosure obligations of attorneys retained by public agencies.

I have enclosed copies of two advice letters, the Albuquerque Advice Letter, No. A-85-244, and the Gifford Advice Letter, No. A-85-201. I have also enclosed a copy of Commission Form 730, "Statement of Economic Interests for Designated Employees." I suggest you refer to the housing commission's conflict of interest code to determine which individuals are required to disclose financial interests, and what specific interests the code itself requires to be disclosed.

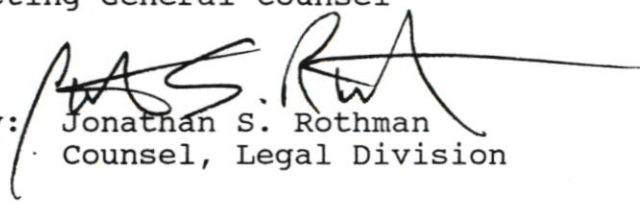
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<sup>1</sup> Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

I trust this letter has provided you with the guidance you requested. If you have any further questions regarding this matter, please contact me at (916) 322-5901.

Sincerely,

Scott Hallabrin  
Acting General Counsel

By:  Jonathan S. Rothman  
Counsel, Legal Division

SH:JSR:plh

Enclosures