



California Fair Political Practices Commission

August 16, 1990

Vash Webster
Valley Insurance Program
448 West Shaw Avenue
Fresno, CA 93704

Re: Your Request for Informal Assistance
Our File No. I-90-423

Dear Mr. Webster:

This is in response to your June 18, 1990 letter seeking confirmation of your agency's filing requirements under the conflict of interest code provisions of the Political Reform Act.^{1/}

It is your understanding that your agency, Valley Insurance Program, is a local government agency not required to forward statements of economic interest to the Fair Political Practices Commission (the "Commission").

You are correct in your understanding. Pursuant to Government Code Section 87500 (k), the Commission is electing not to act as your agency's filing officer. All statements filed by your agency's designated employees, as specified in your agency's conflict of interest code, are to be filed and maintained with your agency. Your letter does indicate two possible locations, either in the office of the administrator or the financial records center. We do ask that you determine which of these two locations will be the filing officer, and include that location in the conflict of interest code file. This will ensure that all designated persons will know exactly where to file their statement. Any confusion as to where a designated employee should file their statements may result in a delay and a possible late filing penalty.

^{1/} 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.

Should you require further assistance with your conflict of interest code, please do not hesitate to contact the Legal Division at (916) 322-5901. If you have questions regarding the Form 730, please contact the Technical Assistance and Analysis Division at (916) 322-5662.

Sincerely,

Scott Hallabrin
Acting General Counsel

By: Cheryl A. Hoff
Staff Services Analyst
Legal Division

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