



FAIR POLITICAL PRACTICES COMMISSION

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March 26, 2007

Donald E. Wilson, Consultant
Senate Committee on Veterans Affairs
1020 N Street, Ste. 251
Sacramento, CA 95814-4900

**Re: Your Request for Advice
Our File No. A-07-039**

This letter is in response to your request for advice regarding the statement of economic interests provisions of the Political Reform Act (the "Act").¹

QUESTION

Are you required to report the business venture you entered into in January 2007 on your combined 2006 annual/leaving office Statement of Economic Interests (Form 700)?

CONCLUSION

No. Since your combined annual/leaving office Form 700 correctly covers the period ending December 31, 2006, you are not required to report the business venture you entered into in January 2007. You will disclose the investment on your next annual Form 700 or if you are required to file an assuming or leaving office statement during 2007.

FACTS

You are a consultant for the California Senate Committee on Veterans Affairs and a Trustee for the Center Unified School District. You previously sat on the Antelope Community Planning Advisory Council (CPAC) for Sacramento County. In our telephone conversation on March 13, 2007, you indicated that you resigned from the Antelope CPAC effective December 26, 2006. On January 24, 2007, you filed a Form 700 as a combined leaving office statement for your Antelope CPAC position and an annual statement for your Senate and school board positions.

¹ Government Code sections 81000 – 91014. Commission regulations appear at Title 2, sections 18109 – 18997, of the California Code of Regulations.

ANALYSIS

Section 87300 requires that all state and local government agencies adopt a conflict-of-interest code. Section 87302 requires that the code specify the positions in the agency that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest. Individuals (designated employees) holding these positions are required to file periodic Statements of Economic Interests (Form 700).

Designated employees are required to file Form 700 within 30 days of assuming a position designated in their agency's conflict-of-interest code, an annual statement for each year that they hold the position (usually due on April 1 of the following year), and a leaving office statement to be filed within 30 days after leaving office. Employees with multiple filing obligations may complete one "expanded statement" covering the disclosure requirements for all positions. (Section 87302; Regulation 18730.) The combined Form 700 you filed on January 24, 2007, correctly covered the period ending December 31, 2006, for all three of the positions you held during 2006. Therefore, you are not yet required to report an investment that was acquired in 2007. This investment must be disclosed on your next required Form 700.

If you have any other questions, please feel free to contact me at (916) 322-5660.

Sincerely,

Scott Hallabrin
General Counsel



By: Tara L. Stock
Political Reform Consultant
Technical Assistance Division

TLS:jsl

ADVICE FILE SUMMARY SHEET

Staff Name	Tara Stock		
Requestor Name	Donald E. Wilson		
Advisee Name	Donald E. Wilson		
Agency Name			
Letter Number	A-07-039	Date Issued	03/26/07

SUBJECT OF LETTER

C/I		C/I Code		Honoraria	
Campaign		Lobbying		84308	
SEI	X	Rev. Door		Gift Limits	
Co-Sponsored		Personal Use		Mass Mailing	
Prop. 34		Misc			

BULLETIN SUMMARY

A former member of the Antelope Community Planning Advisory Council, who resigned effective December 26, 2006, is not required to disclose a 2007 business venture investment on his Leaving Office Statement (Form 700).

Notes/Superseded Letters:

Scott Hallaber
3/26/07