

**FINAL STATEMENT OF REASONS
PROPOSED AMENDMENTS TO THE CONFLICT OF INTEREST CODE
FOR THE FAIR POLITICAL PRACTICES COMMISSION**

Cover Page

No changes to any cover pages.

Executive Office

The position of Information Officer has moved to the Executive Office from the abolished External Affairs and Education Division. The Legislative and External Affairs Coordinator position has been abolished. Legislative Counsel has been added. These positions are added to this part of the code to reflect the Commission's current organization. The positions are now assigned to category one due to the positions' ability to influence agency policy and actions in the Executive Office.

Former External Affairs and Education Division

The Commission has abolished this division. Positions that were formerly in this division are now in the Legal Division.

Legal Division

The Staff Services Manager II position has been removed because the position was abolished.

The Staff Services Manager I position has been added to reflect the Commission's current organization and is assigned to category three which is the category assigned to Legal staff that are not Counsel. This disclosure category is narrowly tailored to economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

Staff Services Analyst/Assistant Political Reform Consultant has been added to reflect the Commission's current organization and is assigned to category three.

Enforcement Division

The position of Supervising Management Auditor is added to this part of the code. This position is assigned disclosure category two, which is the disclosure category assigned to Enforcement staff, other than category one filers. This disclosure category is narrowly tailored to real property and economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

The position of Associate Government Program Analyst has been added. This position is added to the code to reflect the Commission's current organization. This position is assigned disclosure category two, which is the disclosure category assigned to Enforcement staff, other than category one filers. This disclosure category is narrowly tailored to real property and economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

The position of Staff Services Analyst (subpoena services) was renamed Management Services Technician (subpoena services). The job duties of this position have not changed.

Administration and Technology Division

No changes have been made.

Disclosure Categories

Paragraph (D) of Category 3 was removed because the positions this disclosure category is assigned to no longer write formal advice letters.