



# CITY OF ORANGE

CITY CLERK

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November 6 , 2024

Fair Political Practices Commission  
Attn: Commission Assistant  
via Email: [commasst@fppc.ca.gov](mailto:commasst@fppc.ca.gov)

Re: AB 1170 – Electronic Filing of Statements of Economic Interests

The City of Orange is part of the 60% of California cities that use Netfile software for the Statement of Economic Interest filings, providing ease of filing to all filers and immediate transparency to members of the public. The City has over 100 positions required to submit Statement of Economic Interest forms and over 20 positions under the 87200 filing requirements. The Orange City Clerk's Office formally joins our fellow City Clerks in expressing our disappointment at the State's plan to limit Statement of Economic Interest forms to one access point. Certified vendors have been successfully transmitting forms from 87200 filers for over 10 years.

As a certified vendor, Netfile has provided online filing services since 2006, steadily acquiring more and more cities' business along the way. The fact that 60% of all agencies required to file Form 700 use Netfile is a testament to the software's capabilities and dedication of its creator, Tom Diebert, and his staff to develop and implement protocols to assist both the user and the administrators. With some cities having over 10 years of experience using Netfile, a sudden, mandated change for all 87200 filers seems unreasonable.

Our office would like to formally request the FPPC continue to accept Form 700 from 87200 filers from certified systems such as Netfile.

Sincerely,

Pamela Coleman, CMC  
City Clerk  
City of Orange