Our Mission:

“The mission of the Fair Political Practices Commission is to promote the integrity of representative state and local government in California through fair, impartial interpretation and enforcement of political campaign, lobbying, and conflict of interest laws.”
Our History:

- Proposition 9, the Political Reform Act, was approved by California voters in 1974 by 70%.
- Created the FPPC.
- Created new laws related to campaigns, lobbying, and conflicts of interest.
- Regularly amended to address new and changing needs.
ABOUT THE COMMISSION

NON PARTISAN & INDEPENDENT

- Governor
  - Chair (full time) 2019
  - Member (part time) 2019

- Attorney General
  - Member (part time) 2021

- Secretary of State
  - Member (part time) 2021

- Controller
  - Member (part time) 2021
<table>
<thead>
<tr>
<th>FACTS &amp; FIGURES</th>
<th>15 million agency budget out of $280 billion state budget</th>
<th>500,000 public officials</th>
<th>2000+ lobbyists</th>
<th>20,000 campaign committees &amp; candidates</th>
</tr>
</thead>
<tbody>
<tr>
<td>80 employees</td>
<td>500,000+ special districts; 482 cities and town; 58 counties</td>
<td>Oversight applies to small &amp; large, urban and rural areas</td>
<td>3400 lobbyist employers</td>
<td>$500+ million spent on campaigns</td>
</tr>
<tr>
<td>Offices in Sacramento</td>
<td>$340+ million spent on lobbying</td>
<td>Ballot measures and candidate campaigns</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Commission provided advice to over 19,000 inquiries submitted via phone and e-mail, 160 Formal Advice letters and presented 43 webinars and workshops throughout the state. These training events addressed disclosure requirements for the Form 700, candidate/treasurer basics, and filing officer responsibilities.
In 2020 the Commission successfully resolved 1,526 cases, including 271 enforcement settlements approved by the Commission, resulting in fines totaling $1,940,107.
Thank You!
FAIR POLITICAL PRACTICES COMMISSION: A WORKSHOP FOR FILING OFFICERS

Presented by:
Chloe Hackert and Adam Ramirez
Education & External Affairs Unit
Fair Political Practices Commission
September 7, 2022
STATEMENTS OF ECONOMIC INTERESTS

LOCAL FILING OFFICER DUTIES

PRESENTED BY:

CHLOE HACKERT AND ADAM RAMIREZ
EDUCATION & EXTERNAL AFFAIRS UNIT
FAIR POLITICAL PRACTICES COMMISSION
FAIR POLITICAL PRACTICES COMMISSION (FPPC)

Prop 9

- Regulates
- Educates
- Enforces
TOPICS

- Conflict of Interest Codes and the Form 700
- Types of Filers
- Filing Officer Duties
- Notification Guidelines
- Assuming and Leaving Office Statements
- Reviewing Statements
- Amendments

- Public Access
- Statement Retention
- Where do they go?
- Tracking Log
- Fining Policy
- Non-Filers
- Enforcement Referrals
- Electronic-Filing
CONFLICT OF INTEREST CODES AND FORM 700

• All government agencies must adopt a conflict of interest code
• Codes designate positions within the agency that make or participate in making governmental decisions
• Individuals in these positions file Form 700
• Disclosure categories are assigned to each position
• Some filers disclose all economic interests in their jurisdiction, but others will have limited disclosure
TYPES OF FILERS

- Designated Employees (Code Filers)
- 87200 Filers
- Alternates, Designees, and Ex-Officio Board Members
- New Positions (Form 804)
- Consultants (Form 805)
TYPES OF FILERS:
87,200 FILERS

- Board of supervisors*
- Chief administrative officer
- County counsel
- District attorney*
- Planning commissioners
- County treasurer*

- Mayor and Council Members*
- Chief Administrative Officer
- City Manager
- City Attorney
- City Treasurer*
- Planning Commissioners

*and candidates for these positions
TYPES OF FILERS: DESIGNATED FILERS

Examples:

• Deputy Director Administration
• Assistant City Clerk
• Public Information Officer (all levels)
• IT Manager
• Economic Development Coordinator
• Senior Engineer of Planning
• Fleet Maintenance Supervisor
• Deputy Chief Child Support Services
Board and commission members that participate in decision making meetings are required to file—regardless if they are paid or have voting authority. This also applies to individuals serving as:

- Alternate members
- Designee members
- Ex-officio members
FORM 804
NEW POSITIONS

• Identifies new positions involved in making governmental decisions
• Assigns level of disclosure
• Filer must file under full disclosure if disclosure level is not specified
• Individuals must file within 30 days of assuming office
• Kept with agency’s conflict of interest code
FORM 805
CONSULTANTS

- Identifies consultants involved in governmental decision making on behalf of the agency
- Assigns level of disclosure
- Filer must file under full disclosure if disclosure level is not specified
- Individuals must file within 30 days of assuming office
- Kept with agency’s conflict of interest code
• Notify individuals of filing obligations
• Provide form or link to form
• Ensure that statements are timely filed
• Retain statements and maintain a tracking log
• Notify filers of due dates, errors, and late statements
• Review completed statements
• Forward appropriate statements to FPPC
• Provide public access
• Refer violations to FPPC Enforcement Division
YOUR RESPONSIBILITIES AS A FILING OFFICER

Filing officers **Can:**

- Supply the Form 700
- Notify filers of due dates
- Accept and review completed statements
- Notify filers of errors and request amendments
- Provide contact information for technical help for e-filing systems

Filing officers **Cannot:**

- Provide detailed information on how to complete the form
- Provide answers to gift and travel payment questions
PRE-FILING NOTIFICATION GUIDELINES

- Notify at least 30 days prior to annual deadline*
- Notify by email, mail, or in person
- Provide disclosure categories to code filers
- Email notifications should link to Form 700, Reference Pamphlet, FAQs, and gift fact sheets on FPPC website

* Not required for FPPC filers so long as a current email address is included in the filer’s electronic filing system profile
FILING DEADLINES

• Annual statement
  • Judges – March 1
  • Most other filers – April 1
• Assuming office statement — within 30 days of assuming office
• Leaving office statement — within 30 days of leaving office
• No deadline extensions unless a filer is serving in active military duty
ASSUMING OFFICE STATEMENTS

- Filed within 30 days of starting a new job.
- Period covered is the preceding 12 months.
- No annual statement required in new year if office assumed between October 1 – December 31, and filed an assuming office within 30 days.

Assuming office statement NOT required if…

- filer completes term of office and begins a new term of the same office within 30 days.
- filer is 87200 filer and assumes other 87200 position in same jurisdiction within 45 days.
- filer moves from one designated position to another designated position within the same agency.
LEAVING OFFICE STATEMENTS

- Filed within 30 days of leaving position.
- Period covered is January 1 – last day of work. Report:
  - investments and real property that are held on last day.
  - income (including gifts, loans, and travel payments) received since January 1.
- Combined leaving and annual statements may be filed by annual deadline or by last day of work, whichever comes first.

Leaving office statement NOT required if…
- filer completes term of office and begins a new term of the same office within 30 days.
- filer is 87200 filer and assumes other 87200 position in same jurisdiction within 45 days.
- filer moves from one designated position to another designated position within the same agency (in most cases).
FACIAL REVIEW OF THE FORM 700

A facial review is required for all statements maintained by the agency to ensure the cover page is accurate. Look for:

- Name and address of filer
- Period covered
- Type of statement
- Summary completed
- Schedules attached
- Original signature
A full review of the entire form is required on:

• 20% of all timely filed statements—half being selected at random
• Statements that do not pass facial review
• All late statements

Quick Tips!
• Use review guide/amendment request form
• Compare with filer’s disclosure category
COVER PAGE

- Remember to date stamp statements as they are received.
- Filer’s business or agency address is recommended.
- An Excel formatted Form 700 is available online.*

*File a Form 700 > Form 700 > Form 700 – Excel Format
SCHEDULE A-1
INVESTMENTS: STOCKS, BONDS, & OTHER INTERESTS
(OWNERSHIP LESS THAN 10%)

Common Reportable Interest:
• Stocks and partnerships

Common Errors:
• Fair market value not checked
• Managed account reported instead of itemized stocks
• Financial statements attached instead of schedules
• Partnership reported on Schedule A-1, but income not reported on Schedule C
COMMON ERRORS: SCHEDULE A-1

• Filer must disclose the name of the company that holds the stocks, NOT the investment company that manages the portfolio.
<table>
<thead>
<tr>
<th>NAME OF BUSINESS ENTITY</th>
<th>GENERAL DESCRIPTION OF THIS BUSINESS ACTIVITY</th>
<th>FAIR MARKET (Select from drop down list)</th>
<th>NATURE OF INVESTMENT (Select from drop down list. If &quot;other,&quot; describe)</th>
<th>IF APPLICABLE, LIST DATE (mm/dd/20XX) ACQUIRED</th>
<th>DISPOSED</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMCAST</td>
<td>UTILITIES</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AT&amp;T</td>
<td>TELECOMMUNICATIONS</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>APPLE</td>
<td>COMPUTER SYSTEMS</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
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<td></td>
</tr>
<tr>
<td>JOHNSON &amp; JOHNSON</td>
<td>PHARMACEUTICAL</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
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<td></td>
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<td>WAL-MART</td>
<td>RETAIL</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>COCA-COLA</td>
<td>BEVERAGE</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
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<td></td>
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<tr>
<td>MACY'S</td>
<td>RETAIL</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>UNDER ARMOUR</td>
<td>CLOTHING</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>FITBIT INC</td>
<td>HEALTH/TECHNOLOGY</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>BANK OF AMERICA</td>
<td>FINANCE</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ACTIVISION BLIZZARD</td>
<td>VIDEO GAME</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>INTEL CORP</td>
<td>SOFTWARE</td>
<td>$2,000 - $10,000 Stock</td>
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<tr>
<td>FORD MOTOR CO</td>
<td>VEHICLE MANUFACTURING</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NEWS CORP</td>
<td>NEWS</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ELECTRONIC ARTS INC</td>
<td>VIDEO GAME</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NORDSTROM INC</td>
<td>RETAIL</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
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<td></td>
</tr>
<tr>
<td>MICRON TECHNOLOGY INC</td>
<td>ROBOTICS/TECHNOLOGY</td>
<td>$2,000 - $10,000 Stock</td>
<td>Stock</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Common Reportable Interests:

• Filer’s, spouse's/registered domestic partner’s business

• Living trust holdings:
  • Real property
  • Investments – stock

Common Errors:

• Fair market value not reported

• Gross income received not reported

• Failure to disclose clients/income of $10,000 or more

• Precise location of real property not reported
COMMON ERRORS: SCHEDULE A-2

- Filer must list the specific name of each reportable single source of income or check the “none” box.
- Filer must identify the precise location of property held by the business or trust (complete physical address or Assessor’s Parcel Number).
Common Reportable Property:

- Rental property and vacant land (filer’s personal residence is generally not reportable)

Common Errors:

- Precise location not reported
- Sources of rental income not reported
- Income from sale of real property sold during the reporting period not reported on Schedule C
COMMON ERRORS: SCHEDULE B

- Filers must identify the precise location (complete physical address or Assessor’s Parcel Number)
Common Reportable Interests:

- 50% of spouse's or registered domestic partner's income
- Proceeds from any sale, e.g., home or car (but not if proceeds went directly into another home loan or if the car was traded in for another car at the dealer)

Common Errors:

- Name of spouse's or registered domestic partner's employer not reported
- Filer's, spouse's, or registered domestic partner's business reported on Schedule C, instead of Schedule A-2
- Gross income not reported
COMMON ERRORS: SCHEDULE C

Filers must name the spouse’s or partner’s employer as the source of income— the spouse should not be listed as the source of income.

Note: Loans made by a commercial lending institution in the normal course of business are not reportable.
SCHEDULE D
INCOME – GIFTS

Common Reportable Interests:

- Tickets to entertainment events
- Gift cards, discounts, and meals

Common Errors:

- Value of gift not reported
- Date gift received not reported
- Description of gift not reported

Please note the gift limit through December 31, 2022 is $520!
COMMON ERRORS: SCHEDULE D

Acronyms are not allowed unless it is a common one that any reasonable person understands, e.g., AT&T
Common Reportable Interests:
- Third party travel payments (not from the filer’s agency)

Common Errors:
- Value of payment not reported
- Date of travel not reported
- Description of travel not reported
- Gift or income box not checked
COMMON ERRORS: SCHEDULE E

Be sure Dates are filled in!
AMENDMENTS

- Notify filers who appear to have filed incomplete or incorrect statements
- May be filed at any time
- No fines for filing amendments
- Attach to originally filed statement
- Amendments filed by filers whose statements are forwarded to FPPC must be forwarded to FPPC within five days
FORM 700

Amendment Request Guide

You are not required to conduct an investigation when reviewing statements.
FORM 700 PUBLIC ACCESS

• All Form 700s are public documents
• Must be available during regular business hours no later than second business day after receipt
• No conditions on persons seeking access
• No information or identification required
• May not charge more than 10 cents per page for copies (may charge a $5 retrieval fee for statements five or more years old
• Must provide an un-redacted copy if requested
FORM 700 RETENTION

Originals – 7 years

May retain longer but can still be made available upon request.

Copies – 4 years*

After 2 years on file, statements may be put on a space saving device and originals may be discarded.

*Filing officers are not required to keep copies of statements filed through the FPPC’s electronic filing system.
THESE STATEMENTS GO TO FPPC LOCAL

87200 Filers
- Mayors
- Council Members
- Court Commissioners
- Judges
- City Managers

Multi-County Filers
- Check conflict of interest code approved by the FPPC – it will specify in the Incorporation Page where statements are filed.

Courts
- Judges (include pro-tem judges who serve 30 days or more in a calendar year)
- Court Commissioners

Note: Retired judges file directly with FPPC.
<table>
<thead>
<tr>
<th><strong>Retained statements</strong></th>
<th><strong>Forwarded to FPPC</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Keep filer information <strong>current</strong> in your system so it automatically notifies filers</td>
<td>• Keep filer information <strong>current</strong> in your system so it automatically notifies filers</td>
</tr>
<tr>
<td>• Review statements</td>
<td>• Your e-filing system must allow electronic data exchange with FPPC’s e-filing system</td>
</tr>
<tr>
<td>• Request amendments</td>
<td>• Update FPPC’s e-filing system regularly with any filer information changes</td>
</tr>
<tr>
<td>• Assess or waive late fines</td>
<td>• Provide public access</td>
</tr>
<tr>
<td>• Refer non-filers to FPPC</td>
<td></td>
</tr>
</tbody>
</table>
IF YOUR AGENCY DOES NOT HAVE AN E-FILING SYSTEM...

**Retained statements**

- Notify filers and provide form.
- Date stamp all statements.
- Review statements.
- Request amendments.
- Assess or waive late fines.
- Refer non-filers to FPPC.
- Maintain a tracking log.
- Provide public access.

**Forwarded to FPPC**

- Keep filer information **current** in FPPC’s system so it automatically notifies filers.
- Provide public access.
Cities and counties must post a notification that includes all of the following:

- List of elected officers’ names and positions.
- Physical addresses for the FPPC and the city or county clerk’s office.
- A link to the FPPC’s website with a statement that some Form 700s may be available in electronic format.
INTERESTED IN AN ELECTRONIC FILING SYSTEM FOR YOUR AGENCY?

• All agencies have the **option** to adopt an electronic filing system.

• System must meet specific requirements.

• Application and $1,000 fee must be submitted to FPPC for approval.

• More information on FPPC’s website (Fppc.ca.gov> Learn > Guidance for Filing Officers).
## SAMPLE LOG

<table>
<thead>
<tr>
<th>NAME</th>
<th>ANNUAL</th>
<th>ASSUMING</th>
<th>LEAVING</th>
<th>DAYS LATE</th>
<th>AMENDMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anderson, William</td>
<td>04/02/XX</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brown, Sharon</td>
<td>n/a</td>
<td></td>
<td>10/15/XX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carson, David</td>
<td>03/26/XX</td>
<td></td>
<td>09/28/XX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Davies, Gary</td>
<td>04/02/XX</td>
<td></td>
<td></td>
<td></td>
<td>05/25/XX</td>
</tr>
<tr>
<td>Ford, Cheryl</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Iverson, Steven</td>
<td>01/28/XX</td>
<td></td>
<td>10/01/XX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawson, John</td>
<td>n/a</td>
<td></td>
<td>02/14/XX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moore, Roy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nelson, Cheryl</td>
<td>04/11/XX</td>
<td></td>
<td></td>
<td>10</td>
<td></td>
</tr>
</tbody>
</table>

- **Non-Filer**: Brown, Sharon
- **Late-Filer**: Nelson, Cheryl
For statements maintained by the agency, fining is optional unless specific written notice is sent. If the agency fines, it should:

- Adopt written guidelines to ensure fines are assessed/waived on an impartial basis
- Assess fine AFTER statement is filed
- Fine $10 per day, up to a maximum of $100
- Do Not assess fines on filers whose statements are forwarded to FPPC
For statements maintained by your agency:

• Send written notification to annual non-filers within 30 or 120* days after the deadline

• Send a second notification within 30 or 60* days after the date of the first non-filer notification

*Agencies with 50 or fewer filers use the lesser number of days
ENFORCEMENT REFERRALS

For statements maintained by the agency:

- Non-filers must be referred to FPPC’s Enforcement Division
- Refer after sending at least two written notifications
- Make referral within 30 or 45* days after the second notification is sent
- Referrals must be submitted through the Enforcement Electronic Complaint System
- If filer files outstanding statement after referral is submitted, you must provide the FPPC Enforcement Division a copy within 7 days.

*Agencies with 50 or fewer filers use the lesser number of days
WHAT TO INCLUDE IN YOUR ENFORCEMENT REFERRAL

• Most recent address of the non-filer (If a LO non-filer referral, include any personal contact information.)
• Leaving Office/Assuming Office date if relevant
• Last filed statement(s)
• Any previous late filings
• Copy of agency conflict of interest code
• Non-filer notifications
• All relevant attachments and information that Enforcement needs to know
Include the following information in your referral:

- A copy of the conflict of interest code;
- A copy of their most recently filed SEI;
- Copies of the notifications sent (at least two) to the respondent;
- Up to date contact information, including personal contact information; and
- For the filing officer to confirm/check that the person is still holding the position.
Guidance for Filing Officers

Filing officers play an important role in helping to ensure provisions of the Political Reform Act are effectively and efficiently administered. To achieve this goal, the officers are required to perform specified duties under the Act, including providing public access to disclosure statements, following up on those who fail to file, and reviewing filed statements for errors and omissions. The duties are listed in Regulation 18110 for processing campaign statements and Regulation 18115 for processing Statements of Economic Interests (Form 700).

Click on the links below for information about some of the more common filing officer duties. For additional assistance, the FPPC provides several training options for filing officers, including workshops at the FPPC, webinars, online videos, and in-person seminars at your agency. To learn more and pick the training option that best meets your needs, click on the FPPC Training and Outreach link below.

Resources for Filing Officers...

- Campaign Filing Officer Duties
- Form 700 Filing Officer Duties
- FPPC Training & Outreach

Form 700 Electronic Filing Certification for an Agency’s Internal Filer

WWW.FPPC.CA.GOV
RESOURCES FOR FILERS

FPPC home page >

File a Form 700

• Form 700 Videos!
• Reference Pamphlet
• Form 700 FAQs
• Amendment Schedules
• Gift and Travel Fact Sheet for Local Officials
• Gift Tracking App
FILING OFFICERS’ FPPC CONTACT INFORMATION

- FPPC’s E-Filing System Questions: form700@fppc.ca.gov
- Cities A-M: Sonia Rangel srangel@fppc.ca.gov
- Cities N-Z: William Cameron wcameron@fppc.ca.gov
- Counties: Cyndi Glaser cglaser@fppc.ca.gov
- Courts: Theresa Poon tpoon@fppc.ca.gov
- Multi-County Agencies: Molly Rengchhup mrengchhup@fppc.ca.gov
- State Agencies: Andrea Carey acarey@fppc.ca.gov
MANAGING YOUR FPPC FORM
700 FILERS

• Filers whose statements are forwarded to FPPC will use either their agencies’ FPPC certified electronic filing system or FPPC’s electronic system to file their form 700s.

• For original statements that you forward to the FPPC that aren’t e-filed: forward assuming, annual, and leaving office original “wet signature” statements to the FPPC no later than five days after the filing deadline.
PROCEDURES FOR AGENCIES USING FPPC’S E-FILING SYSTEM

• Keep filers’ information current in the electronic system including assuming and leaving office information.

• If you have a new filer, please add the filer into the system, including the assume date of office, filer’s position, address, email and phone number.

• If the filer goes from one 87200 position to another 87200 position within the same entity and with no break in service, this would be considered as a “Transfer.”

• If a filer has already left office, please update the leaving office date into the system.

• To e-file candidate statement, please notify your FPPC filing officer to add candidate statements to the candidates’ e-filing profile.
PROCEDURES FOR AGENCIES USING THEIR OWN E-FILING SYSTEM

• Keep filers’ information current in the electronic system including assuming and leaving office information.

• Effective January 1, 2018, Form 700 statements that are filed electronically and required to be forwarded to the FPPC, your agency’s systems are required to allow electronic data exchange with the FPPC electronic system.

• **Filers’ information in your system must exactly matches FPPC’s system for a successful electronic data exchange.**
• Regulation 18104 specifies that an original document can be submitted either (1) in paper format with a handwritten signature, or (2) in electronic format with a secure electronic signature, if permitted by the agency responsible for maintaining the original document.

• Regulation 18757 permits agencies to continue to use (or develop) a certified electronic filing system, but also recognizes that alternative methods of filing an original SEI are available and secure.

• A Form 700 filer would be permitted to file their original Form 700 with a secure electronic signature via the official's agency email address, provided that the official's agency permits the submission with an electronic signature.
Contact us with questions!
Email advice: advice@fppc.ca.gov
Phone Advice Line: 866-275-3772

Now onto Conflict of Interest Codes!
The visual aids used in FPPC workshops are guides which contain only highlights of selected provisions of the law. They do not carry the weight of the law.
OVERVIEW

- What is a conflict of interest code?
- Types of Form 700 filers
- Three components of a conflict of interest code
- How to identify necessary changes to your agency’s conflict of interest code
Every government agency must adopt a conflict of interest code. A conflict of interest code is the legal instrument requiring those individuals holding designated positions to disclose their financial interests to help avoid conflicts of interest.
• Public official/employee holds a position that involves:
  ❖ Making or participating in making governmental decisions.

• Position is designated in the code:
  ❖ Disclosure is based on a position’s level of decision making.

• Official/employee files Statements of Economic Interests (Form 700):
  ❖ Serves as a reminder to official/employee of potential conflicts.
  ❖ Public document.
TYPES OF FORM 700 FILERS

Code Filers

A designated position in a conflict of interest code is often referred to as a “code filer” because the position files a Form 700 based on its designation in the conflict of interest code.

87200 Filer

Position specifically listed in Section 87200 or meets the criteria in Regulation 18700.3 as a public investment manager is an 87200 filer.
WHO IS LISTED IN GOV. CODE SECTION 87200?

City Officials
- Mayor/Council Members
- Chief Administrative Officer
- City Manager
- City Attorney
- Planning Commissioners
- Treasurer

County Officials
- Board of Supervisors
- Chief Administrative Officer
- County Counsel
- District Attorney
- Planning Commissioners
- County Treasurer
The following positions are not covered by the code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

Board Members
Alternate Board Members
Executive Director
Chief Financial Officer

Individuals holding the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.
Each local agency must review its conflict of interest code biennially.

By July 1: Code reviewing body must notify all agencies.

By October 3: All agencies must submit the notice to the code reviewing body.

Before completing the notice, review the agency’s organizational chart and current code, including the disclosure categories.
2022 Multi-County Agency Biennial Notice
Orange Cove Irrigation District
633 6th Street, Orange Cove, CA 93646
John Doe Phone No. (559)555-5555
jdoe@ocid.gov Alternate Email:

Counties within Jurisdiction, or for Charter Schools, Counties in which the School is Chartered:
Fresno, Tulare

No. of Employees* 13 No. of Form 700 Filers* 9
*Including board and committee members

Accurate disclosure is essential to monitor whether officials have conflicts of interest and to help ensure public trust in government. The biennial review examines current programs to ensure that the agency’s code includes disclosure by those agency officials who make or participate in making governmental decisions.

Please identify which statement accurately describes your agency’s status.

☐ This agency has reviewed its conflict of interest code. The current code designates all positions which make or participate in making governmental decisions. The designated positions are assigned accurate disclosure categories that relate to the job duties of the respective positions. The code incorporates FPPC regulation 18730 so that all relevant Government Code Sections are referenced.

☐ This agency has reviewed its conflict of interest code and has determined that an amendment is necessary. An amendment may include the following:

- New positions which involve the making or participating in the making of decisions which may foreseeably have a material impact on a financial interest
- Current designated positions need renaming or deletion
- Statutorily required provisions of the code need to be addressed
- Disclosure categories need revision
City agencies need to make sure that by July 1, all city agencies have the notice. City agencies need to file the biennial notice with the city council by October 3.
Code Review Process

Compare existing conflict of interest code against current organizational structure.

- Have new positions or divisions been created? Abolished? Duties merged?
- Have duties of positions designated in the code changed to warrant adjusting their disclosure obligations?
THREE COMPONENTS OF A CONFLICT OF INTEREST CODE
THREE COMPONENTS
OF A CODE

1. Terms of the code
   (Incorporation of Regulation 18730)

2. List of designated positions
   (The positions in your agency that are required to file a Form 700)

3. Disclosure categories
   (The specific interests to be reported on a Form 700)
Incorporation Language

Where to File

CONFLICT OF INTEREST CODE FOR THE
ORANGE COVE IRRIGATION DISTRICT

The political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission had adopted a regulation (2 Cal. Code of Regs. Sec. 18730) which contains the terms of a standard conflict of interest code that can be incorporated by reference in an agency’s code. After public notice and hearing it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices designating officials and employees and establishing disclosure categories shall constitute the conflict of interest code of the Orange Cove Irrigation District (District).

Designated employees shall file their statements of economic interests with the District, which will make the statements available for public inspection and reproduction (Gov. Code Section 81008.) The District will retain statements for all designated employees.
Every position in your agency that is involved in making or participating in making governmental decisions must be designated in your agency’s code.
WHAT DOES IT MEAN TO “MAKE” A DECISION?

Making a decision means:

✓ Voting on a matter
✓ Approving the budget
✓ Adopting policy
✓ Making purchasing decisions
✓ Entering into contracts
“Participate” means:

- Negotiating the terms of a contract
- Writing the specifications of a bid
- Advising or making recommendations to the decision-maker or governing body without significant intervening substantive review
Developing Your List of "Designated Positions"

- Maintain your broad policy/decision makers in the code.
- Eliminate positions whose duties are clerical, secretarial, ministerial, or manual.

Then

- Review the duty statements of everyone between these two levels. Look closely at how many levels of substantive review these positions have.
## DEVELOPING YOUR LIST OF “DESIGNATED POSITIONS”

<table>
<thead>
<tr>
<th>KEEP</th>
<th>Broad policy decision makers. For example, Directors and executive staff.</th>
</tr>
</thead>
<tbody>
<tr>
<td>REVIEW DUTY STATEMENTS FOR</td>
<td>Positions that aren’t broad policy decision makers or clerical, secretarial, ministerial, or manual. For example, Information Systems Analyst, Fleet Manager, Purchasing Agent, and Administrative Officer.</td>
</tr>
<tr>
<td>ELIMINATE</td>
<td>Positions whose duties are clerical, secretarial, ministerial, or manual. For example, secretary and tree trimmer.</td>
</tr>
</tbody>
</table>
DESIGNATION BASED ON DUTIES

Based on the stated duties, which of the following positions should be in the agency’s code?

**Director of Operations**
Prepares and administers the department budget. Works independently in the development of capital improvement projects.

**Administrative Assistant**
Prepares accounting spreadsheets and meeting minutes, schedules meetings, posts information on website.

**YES**

**PROBABLY NOT**
Other than those which are solely advisory, when a board or commission is formed, the members must file under full disclosure until the positions are included in a conflict of interest code.

For board and commission members, including alternates, Form 700s are due no later than 30 days after assuming office.
<table>
<thead>
<tr>
<th>Designated Positions</th>
<th>Disclosure Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board Members &amp; Alternates</td>
<td>1</td>
</tr>
<tr>
<td>Chief Executive Officers</td>
<td>1</td>
</tr>
<tr>
<td>Principals</td>
<td>2</td>
</tr>
<tr>
<td>Director of Information Technology</td>
<td>2</td>
</tr>
<tr>
<td>Risk Manager</td>
<td>3</td>
</tr>
<tr>
<td>Transportation Commissioners</td>
<td>3</td>
</tr>
<tr>
<td>Purchasing Agent</td>
<td>4</td>
</tr>
<tr>
<td>Consultants/New Positions</td>
<td>*</td>
</tr>
</tbody>
</table>
Individuals serving in a new position created on or after January 1, 2010, must file under the broadest disclosure category in your agency’s code.

Agency may provide more limited disclosure by using Form 804.

Add newly created positions to the conflict of interest code when it is amended.
CONSULTANTS - FORM 805

- Use Form 805 to limit disclosure.
- Unsure of who is a consultant?
  - Contact your agency attorney.
  - Contact your code reviewing body.
  - Utilize FPPC advice services if you still cannot decide.
*Consultants/New Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The [head of agency or their designee] may determine in writing that a particular consultant or new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such determination shall include a description of the consultant's or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The [head of agency or their designee’s] determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code. (Gov. Code Section 81008.)
DISCLOSURE CATEGORIES
Disclosure categories describe the types of interests to be disclosed on a Form 700.

Designated positions can only be required to disclose interests that they may affect in the course of performing the position’s duties.

City of Carmel-by-the-Sea v. Young
County of Nevada v. MacMillen
REAL PROPERTY LIMITATIONS

Does the designated position participate in decisions affecting real property?

If the answer is “no,” do not require the disclosure of interests in real property.
Which of the following positions should be required to report real property interests?

- Claims Manager
- Information Technology Director
- Planning Director
- Appraiser
- Personnel Director
1. Does the Agency issue grants?
2. Does the Agency license entities?
3. Does the Agency have enforcement authority?
4. Does the Agency have an auditing function?
5. Does the agency process claims?
The gift limit and honoraria ban are tied to sources of income required to be disclosed on statements of economic interests.

Please note that effective January 1, 2021, the gift limit is $520 and will be adjusted again on January 1, 2023.
PITFALLS TO AVOID

- Do not give full disclosure to positions with limited decision-making authority.
- Do not cite Form 700 schedules as your “disclosure categories.”
- Do not include provisions that go beyond the scope of the Political Reform Act.
- Do not include the gift limit or due dates.
• You have amended your code to include all positions that should be designated in the code, and,

• You have assigned clear and concise disclosure categories.

Now...

Contact your “code reviewing body” for further instructions.
DUTIES OF CODE REVIEWING BODY

• Review proposed code or amendments to ensure legal compliance (Gov. Code Section 87302)

• May not approve a code that exceeds requirements of the Political Reform Act

• Conflict of interest code is not effective until approved by the code reviewing body
Review and preparation of codes by local government agencies must be carried out under procedures that guarantee to officers, employees, members, and consultants of the agency, and to residents of the jurisdiction, **adequate notice and a fair opportunity** to present their views.
RESOURCES FOR LOCAL CITY AGENCIES

- Local Biennial Notice Instructions
- Biennial Notice
- Training and Outreach
- Online training video
- Email Advice

Local Government Agencies-Adopting & Amending Conflict of Interest Codes

A local agency’s conflict of interest code must reflect the current structure of the organization and properly identify officials and employees who should be filing Statements of Economic Interests (Form 700s). A code tells public officials, governmental employees, and consultants what financial interests they must disclose on their Form 700s. It helps provide transparency in local government as required under the Political Reform Act.

Biennial Review of Conflict of Interest Codes

To ensure conflict of interest codes remain current and accurate, each local agency is required to review its code at least every even-numbered year. The agency should receive a Biennial Notice as a reminder of this obligation from its code reviewing body.

The County Board of Supervisors is the code reviewing body for county agencies and the code reviewing body for city agencies is the City Council.

When determining whether to amend, an agency should carefully review its current conflict of interest code and consider the following:

- Is the current code more than five years old?
- Have there been any substantial changes to the agency’s organizational structure since the current code was adopted?
- Have any positions been eliminated or renamed since the current code was adopted?
- Have any new positions been added since the current code was adopted?
- Have there been any substantial changes in duties or responsibilities for any positions since the current code was adopted?
- If an agency answers “yes” to any of the above questions, most likely its conflict of interest code will need to be amended.

The resources below provide guidance to local agencies about amending codes. The information is categorized based on the jurisdiction of the agency.

County Agencies
- Local Biennial Notice Instructions
- Biennial Notice

City Agencies
- Local Biennial Notice Instructions
- Biennial Notice
THANK YOU!

Fair Political Practices Commission
Legal Division
Education & External Affairs Unit &
Email Advice and Conflict of Interest Code Program

Now time for Campaign Filing Officer Duties!
FILING OFFICER DUTIES

CANDIDATES AND COMMITTEES

Presented by:
FPPC Education & External Affairs
Chloe Hackert and Adam Ramirez
September 7, 2022
Proposition 9, known today as the Political Reform Act, regulates conflicts of interest, campaign finance, and lobbying activity.

The FPPC was created to implement and enforce the Act, and to inform and assist candidates and public officials in complying with these laws.
LET’S LEARN ABOUT:

• Campaign Filing Officer duties
• Committees
• Filing Schedules
CAMPAIGN FILING OFFICER DUTIES

- Supply forms
- Receive and maintain statements
- Review statements
- Notify non-filers
- Provide public access
- Refer to FPPC’s Enforcement Division as needed

FPPC Regulation 18110
<table>
<thead>
<tr>
<th>Committee Type</th>
<th>Threshold (includes personal funds)</th>
<th>Registration Forms</th>
<th>Campaign Reports</th>
<th>24-Hour Contribution Reports</th>
<th>Independent Expenditure Reports</th>
<th>Manuals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Candidate (recipient)</td>
<td>Less than $2000</td>
<td>501</td>
<td>470</td>
<td>NA</td>
<td>496 and 462*</td>
<td>1 or 2</td>
</tr>
<tr>
<td>Candidate (recipient)</td>
<td>$2000 or more</td>
<td>501 and 410</td>
<td>460</td>
<td>497</td>
<td>496 and 462*</td>
<td>1 or 2</td>
</tr>
<tr>
<td>Ballot Measure (recipient)</td>
<td>$2000</td>
<td>410</td>
<td>460 or 450 or 425</td>
<td>497</td>
<td>496 and 462*</td>
<td>3</td>
</tr>
<tr>
<td>General Purpose (recipient)</td>
<td>$2000</td>
<td>410</td>
<td>460 or 450 or 425</td>
<td>497</td>
<td>496 and 462*</td>
<td>4</td>
</tr>
<tr>
<td>Primarily Formed (recipient)</td>
<td>$2000</td>
<td>410</td>
<td>460 or 450 or 425</td>
<td>497</td>
<td>496 and 462*</td>
<td>1, 2, or 3</td>
</tr>
<tr>
<td>Major Donor (non-recipient)</td>
<td>$10,000</td>
<td>NA</td>
<td>461</td>
<td>497</td>
<td>496 and 462*</td>
<td>5</td>
</tr>
<tr>
<td>Independent Expenditure (non-recipient)</td>
<td>$1000</td>
<td>NA</td>
<td>461</td>
<td>497</td>
<td>496 and 462*</td>
<td>6</td>
</tr>
</tbody>
</table>

*This form is required within 10 days after an independent expenditure that totals, in the aggregate, $1,000 or more in a calendar year to support or oppose a candidate or measure. A candidate or measure is reported only once for each election, even if the IEs total more than $1000.
Candidates and committee should be referred to filing schedules if they have questions about:

- Which forms to submit
- Filing Periods
- Deadlines
- Resources/Additional Information*

*While filing schedules list additional information, the filing schedule may not have all information. Please contact the FPPC for questions about filing schedules.
<table>
<thead>
<tr>
<th>Deadline</th>
<th>Period</th>
<th>Form</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug 1, 2022</td>
<td>* – 6/30/22</td>
<td>460</td>
<td>All committees must file this statement.</td>
</tr>
<tr>
<td>Semi-Annual</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Within 24</td>
<td>8/10/22 – 11/8/22</td>
<td>497</td>
<td>File if a contribution of $1,000 or more in the aggregate is received from a single source.</td>
</tr>
<tr>
<td>Hours Contribution</td>
<td></td>
<td></td>
<td>File if a contribution of $1,000 or more in the aggregate is made to or in connection with another candidate or measure being voted upon November 8, 2022.</td>
</tr>
<tr>
<td>Reports</td>
<td></td>
<td></td>
<td>The recipient of a non-monetary contribution of $1,000 or more in the aggregate must file a Form 497 within 48 hours from the time the contribution is received.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>File by personal delivery, e-mail, guaranteed overnight service, or fax. The committee may also file online, if available.</td>
</tr>
<tr>
<td>Sep 29, 2022</td>
<td>7/1/22 – 9/24/22</td>
<td>460 or 470</td>
<td>Each candidate listed on the ballot must file Form 460 or Form 470 (see below).</td>
</tr>
<tr>
<td>1st Pre-Election</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oct 27, 2022</td>
<td>9/25/22 – 10/22/22</td>
<td>460</td>
<td>All committees must file this statement.</td>
</tr>
<tr>
<td>2nd Pre-Election</td>
<td></td>
<td></td>
<td>File by personal delivery or guaranteed overnight service. The committee may also file online, if available.</td>
</tr>
<tr>
<td>Jan 31, 2023</td>
<td>10/23/22 – 12/31/22</td>
<td>460</td>
<td>All committees must file Form 460 unless the committee filed termination Forms 410 and 460 before December 31, 2022.</td>
</tr>
</tbody>
</table>
FILING SCHEDULE REQUESTS

• Filing schedules for local elections

• Provide the FPPC lead time to create the requested filing schedule

• Send request to advice@fppc.ca.gov
What to look for when reviewing/receiving Candidate/Committee Forms
RECEIVING AND REVIEWING FORMS

What are two things you know?

What are two things you DON’T know?
FORM 700 – CANDIDATE STATEMENTS

• Deadline: declaration of candidacy
  
  Exception: Not required if incumbents file assuming or annual statement within 60 days before filing the declaration of candidacy

• Accept candidate statements for retention or forwarding

• Forward original candidate statements to FPPC for 87200 filers, including:
  
  ▪ Statewide Officers – including BOE
  ▪ Senate and Assembly
  ▪ Judges
  ▪ Board of Supervisors
  ▪ District Attorneys
  ▪ Mayors and City Council Members
FORM 501: CANDIDATE INTENTION STATEMENT

- Before spending or receiving funds
- EVERY election
- Local Filing Officer
Local committees should provide the local filing officer a copy of the Form 410.

The original Form 410 should be filed with the Secretary of State’s Office (“SOS”). Once the Form 410 is accepted, SOS will issue a Committee ID number.

In order to terminate the committee, the committee must file an original Form 410 marked for termination with the SOS. A copy will be filed locally.
FORM 470-
RECORDKEEPING
SHORT FORM

Use if filer...

• Does not have a controlled committee, and

• Does not anticipate receiving contributions of $2000 or more during the calendar year, and

• Does not anticipate spending $2000 or more during the calendar year.
• Candidate exceeded $2000 threshold after Form 470 was filed
• Filed within 48 hours of exceeding the threshold
• Delivered by overnight delivery, personal delivery, e-mail, or fax
• Delivered to ALL of the following:
  • Local Filing Officer
  • Opposing Candidates
  • Secretary of State
$1,000 or more from a single source within the 90 days before and on the date of the election

Form 497 – Contribution
  • Exception: due date falls on weekend (not the weekend before the election) or holiday

Form 496 – Independent Expenditure
  • No weekend or holiday exception

Delivered by e-mail, personal delivery, overnight service, fax
• Record keeping form for active, qualified and open committees
• Used to report money-in and money-out of the committee
• Used in tandem with filing schedules
• Generally, state committees file with the Secretary of State
• Generally, local committees file with the filing officer of the local jurisdiction
AS A FO, WHAT DO I NEED TO KNOW ABOUT CAMPAIGN STATEMENTS?

- Public documents
- Review all statements
- 460 Amendment Request Form
- Postmark is the date filed
- $10/day late fee
- Review, not verify
- AB 571 (local campaign contribution limits)
ONE OF THE FILING OFFICER’S DUTIES IS TO REVIEW THE CAMPAIGN STATEMENT FORM 460

LET’S REVIEW ONE!
COMMON ERRORS ON THE FORM 460 COVER PAGE

• Date and signature of Candidate and Treasurer
• Indicating the type of statement being filed
• Entering the correct reporting period
Form 460 – Cover Page

1. Type of Recipient Committee:
   - Check box: Offholder, Candidate Controlled Committee
   - Check box: Primary Formed Candidate/Offholder Committee

2. Statement covers period:
   - From 1/1/20
   - Through 6/1/20

3. Committee Information
   - Name: Hermione Granger for Minister of Magic 20XX
   - Address: 1800 Park St., Southwark, CA 18442
   - Phone: 555-555-1234
   - Email: hermione4minister@gmail.com

4. Verification
   - Signed: Penelope Clearwater
   - Date: 7/15/XX

Treasurer(s)
- Name: Penelope Clearwater
- Address: 2400 Charing Cross Rd., Covent Garden, CA 20634
- Phone: 555-555-1233
COMMON ERRORS ON THE SUMMARY PAGE

- Failure to carry totals from summary sections
- Failure to report zeros in Column A
- Failure to complete Column B
Form 460 – Summary Page

**Campaign Disclosure Statement**

**Summary Page**

**HERMIONE GRANGER FOR MINISTER OF MAGIC 20XX**

### Contributions Received

<table>
<thead>
<tr>
<th>Description</th>
<th>Column A</th>
<th>Column B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary Contributions</td>
<td>$1,800</td>
<td></td>
</tr>
<tr>
<td>Loans Received</td>
<td></td>
<td>$7,500</td>
</tr>
<tr>
<td><strong>SUBTOTAL CASH CONTRIBUTIONS</strong></td>
<td><strong>$6,880</strong></td>
<td><strong>$9,380</strong></td>
</tr>
<tr>
<td>Nonmonetary Contributions</td>
<td>$2,250</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL CONTRIBUTIONS RECEIVED</strong></td>
<td><strong>$9,130</strong></td>
<td><strong>$11,630</strong></td>
</tr>
</tbody>
</table>

### Expenditures Made

<table>
<thead>
<tr>
<th>Description</th>
<th>Column A</th>
<th>Column B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payments Made</td>
<td></td>
<td>$5,575</td>
</tr>
<tr>
<td>Loans Made</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td><strong>SUBTOTAL CASH PAYMENTS</strong></td>
<td><strong>$5,575</strong></td>
<td><strong>$5,575</strong></td>
</tr>
<tr>
<td>Accrued Expenses (Unpaid Bills)</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Nonmonetary Adjustment</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL EXPENDITURES MADE</strong></td>
<td><strong>$7,825</strong></td>
<td><strong>$7,825</strong></td>
</tr>
</tbody>
</table>

### Current Cash Statement

<table>
<thead>
<tr>
<th>Description</th>
<th>Column A</th>
<th>Column B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beginning Cash Balance</td>
<td></td>
<td>$5,420</td>
</tr>
<tr>
<td>Cash Receipts</td>
<td></td>
<td>6,880</td>
</tr>
<tr>
<td>Miscellaneous Increases to Cash</td>
<td></td>
<td>125</td>
</tr>
<tr>
<td>Cash Payments</td>
<td></td>
<td>2,925</td>
</tr>
<tr>
<td><strong>ENDING CASH BALANCE</strong></td>
<td><strong>$9,500</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Cash Equivalents and Outstanding Debts**

<table>
<thead>
<tr>
<th>Description</th>
<th>Column A</th>
<th>Column B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Equivalents</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Outstanding Debts</td>
<td></td>
<td>$7,500</td>
</tr>
</tbody>
</table>

**Statement covers period**

- **from:** 1/1/20
- **through:** 6/1/20

**Calendar Year Summary for Candidates Running in Both the State Primary and General Elections**

- **20. Contributions Received:** $  
- **21. Expenditures Made:** $  

**Expenditure Limit Summary for State Candidates**

- **Date of Election (mm/dd/yy):** / /  
- **Total to Date:** $  

*Amounts in this section may be different from amounts reported in Column B.*

Clear Summ Pg  Print Form
HERE ARE SOME 460 REVIEW TIPS FOR THE SCHEDULES!
 COMMON ERRORS IN REPORTING CONTRIBUTIONS

• “Date Received” falls outside of statement period
• Itemized contributions do not include complete addresses
• Itemized contributions do not include occupation/employer information
DONOR INFORMATION

Individual contributors of $100 or more:
• Name and street address
• The occupation and employer

Manager, Harvey’s Hardware Store
Self-Employed, No Separate Business Name
Attorney, Fong & Associates
Consultant, Strategic Politics
Homemaker or Student

Manager
Owner
Neighbor
Friend
Consultant, SPS Inc.
Business Person
Entrepreneur
Philanthropist
COMMON ERRORS ON SCHEDULE A

- Contributions are incorrectly listed
- Donor information is incorrect
- Subtotal is missing
### Form 460 — Schedule A

**Hermione Granger for Minister of Magic 2020**

<table>
<thead>
<tr>
<th>Date</th>
<th>Full Name, Address, and ZIP</th>
<th>Amount Received</th>
<th>Occupation/Job Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>4/13/20</td>
<td>Colin Creevey 800 Monument Rd., Paddington, CA 95169</td>
<td>700</td>
<td>Physician</td>
</tr>
<tr>
<td>4/21/20</td>
<td>Weasley’s Wizard Wheezes 93 Diagon Alley Charing Cross, CA 20754</td>
<td>500</td>
<td></td>
</tr>
<tr>
<td>5/23/20</td>
<td>Society for the Promotion of Elfish Welfare 70 Whitehall Rd., Westminster, CA 12382</td>
<td>353</td>
<td></td>
</tr>
</tbody>
</table>

**Schedule A Summary**

1. Amount received this period — itemized monetary contributions.
   (Include all Schedule A subtotals.) $1553
2. Amount received this period — unitemized monetary contributions of less than $100 $247
3. Total monetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.) TOTAL $1800

**Notes:**
- ID #
- Form 460 — Schedule A
- Statement covers period from 1/1/20 through 6/1/20
- ID Number: 123456
- California Form 460
COMMON ERRORS ON SCHEDULE B

- Not checking a contributor code
- Not listing an occupation or employer
- Forgetting to place a 0 or N/A in a field
Form 460 – Schedule B

<table>
<thead>
<tr>
<th>Name of Business</th>
<th>Loan Amount</th>
<th>Outst. Bal.</th>
<th>Amount Received</th>
<th>Date Due</th>
<th>Int. Paid</th>
<th>Int. Due</th>
<th>Subtotal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gringott's Bank</td>
<td>7,500</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>7,500</td>
</tr>
<tr>
<td>Hermione Granger</td>
<td>2,500</td>
<td>2,500</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2,500</td>
</tr>
</tbody>
</table>

Total Subtotal: $7,500

N/A = Not Applicable
0 = Zero
COMMON ERRORS ON SCHEDULE C

- Forgetting the address of a contributor
- Not listing a contributor code
- Missing subtotal
Form 460 – Schedule C

Schedule C
Nonmonetary Contributions Received

<table>
<thead>
<tr>
<th>Date</th>
<th>Name</th>
<th>Occupation/Service</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/22/20</td>
<td>Ernie Macmillan</td>
<td>Owner, Honeydukes Sweetshop</td>
<td>500</td>
</tr>
<tr>
<td></td>
<td>33 King Street</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Covent Garden, CA 28643</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5/12/20</td>
<td>Wizards for Arithmancy</td>
<td>Accounting services</td>
<td>250</td>
</tr>
<tr>
<td></td>
<td>Duke Street</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mayfair, CA 15764</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7/12/20</td>
<td>Luna Lovegood</td>
<td>Flyers</td>
<td>1,200</td>
</tr>
<tr>
<td></td>
<td>37 Hoxton Square</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shoreditch, CA 19620</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Add # The Quibbler

Schedule C Summary

1. Amount received this period – itemized nonmonetary contributions. $1,850
2. Amount received this period – itemized nonmonetary contributions of less than $100 $300
3. Total nonmonetary contributions received this period. $2,150

SUBTOTAL $1,850
COMMON ERRORS ON SCHEDULES D AND E

• Failure to report code or description
• Completing whether they support or oppose a candidate
• Failure to report independent expenditures and contributions
Form 460 – Schedule D

<table>
<thead>
<tr>
<th>DATE</th>
<th>NAME OF CANDIDATE, OFFICE, AND DISTRICT, OR MEASURE NUMBER OR LETTER AND JURISDICTION, OR COMMITTEE</th>
<th>TYPE OF PAYMENT</th>
<th>DESCRIPTION (IF REQUIRED)</th>
<th>AMOUNT THIS PERIOD</th>
<th>CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)</th>
<th>PER ELECTION TO DATE (IF REQUIRED)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/31/20</td>
<td>Gilderoy Lockhart for Owlet Trainer Academy Board 20XX 890 Highbridge Rd. Barking, CA 11732</td>
<td>Monetary</td>
<td>Contribution</td>
<td>275</td>
<td>275</td>
<td></td>
</tr>
</tbody>
</table>

**Schedule D Summary**

1. Itemized contributions and independent expenditures made this period. (Include all Schedule D subtotals.) $275
2. Unitemized contributions and independent expenditures made this period of under $100 $0
3. Total contributions and independent expenditures made this period. (Add Lines 1 and 2. Do not enter on the Summary Page.) TOTAL: $275
Form 460 – Schedule E

<table>
<thead>
<tr>
<th>NAME AND ADDRESS OF PAYEE</th>
<th>CODE</th>
<th>DESCRIPTION OF PAYMENT</th>
<th>AMOUNT PAID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owl Express Communications</td>
<td>OFC</td>
<td>Internet, phone</td>
<td>1300</td>
</tr>
<tr>
<td>Chelsea, 15736</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gilderoy Lockhart for Owlet Trainer Academy Board</td>
<td></td>
<td></td>
<td>275</td>
</tr>
<tr>
<td>20XX 890 Highbridge Rd.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Barking, CA 11732</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

**Subtotal**: $1575

**Schedule E Summary**

1. Itemized payments made this period. (Include all Schedule E subtotals.) $ 4,225
2. Unitemized payments made this period of under $100. $ 1,350
3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).) $ 0
4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.) **TOTAL** $ 5,575
### Form 460 – Schedule E (cont.)

**HERMIONE GRANGER FOR MINISTER OF MAGIC 2020**

<table>
<thead>
<tr>
<th>NAME AND ADDRESS OF PAYEE</th>
<th>CODE OR</th>
<th>DESCRIPTION OF PAYMENT</th>
<th>AMOUNT PAID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cho Chang Consulting</td>
<td>CNS</td>
<td>LIT VOT</td>
<td>1,400</td>
</tr>
<tr>
<td>Daily Prophet, 29 Savoy Pl, London, CA 26520</td>
<td></td>
<td></td>
<td>$750</td>
</tr>
<tr>
<td>Snape Voter Systems, 7 Rye Rd., Peckham, CA 15499</td>
<td></td>
<td></td>
<td>$525</td>
</tr>
<tr>
<td>Hermione Granger</td>
<td></td>
<td></td>
<td>500</td>
</tr>
<tr>
<td>1800 Park St.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southwark, CA 18442</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gringott’s Bank</td>
<td></td>
<td>Credit card payment</td>
<td>750</td>
</tr>
<tr>
<td>Diagon Alley</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mayfair, CA 20754</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**VENDORS PAID $500 OR MORE:**

- Daily Prophet, 29 Savoy Pl, London, CA 26520
- Snape Voter Systems, 7 Rye Rd., Peckham, CA 15499

**SUBTOTAL:** $2,650

---

*Payments that are contributions or independent expenditures must also be summarized on Schedule D.*
INFORMATION TO HELP WITH SCHEDULE I

• Schedule I is used for anything that is not a contribution.

• Use Schedule I to report transactions that increase the cash position.

• Examples could be a refund, interest received on an account, or proceeds from a sale above the fair market value.
### Form 460 – Schedule I

**HERMIONE GRANGER FOR MINISTER OF MAGIC 20XX**

<table>
<thead>
<tr>
<th>DATE RECEIVED</th>
<th>FULL NAME AND ADDRESS OF SOURCE OF CASH</th>
<th>DESCRIPTION OF RECEIPT</th>
<th>AMOUNT OF INCREASE TO CASH</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/30/XX</td>
<td>Owl Express Communications</td>
<td>Refund of deposit</td>
<td>100</td>
</tr>
</tbody>
</table>

**Schedule I Summary**

1. Itemized increases to cash this period...

2. Unitemized increases to cash of under $100 this period...

3. Total of all interest received this period on loans made to others. (Schedule H, Column (e)).

4. Total miscellaneous increases to cash this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Line 14.)

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subtotal</td>
<td>100</td>
</tr>
<tr>
<td>Total</td>
<td>125</td>
</tr>
</tbody>
</table>
**AMENDMENT REQUEST FORM**

- Used to inform committees on needed amendments.
- Can be used by CFO to review Form 460s.

---

**AMENDMENT REQUEST FORM**

<table>
<thead>
<tr>
<th>Cover Page</th>
<th>Schedule C</th>
<th>Schedule D</th>
<th>Schedule E</th>
<th>Schedule F</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Period covered (for all schedules)</td>
<td>• Date received column was left blank</td>
<td>• Date was missing</td>
<td>• Street address of payee was incomplete</td>
<td>• Street address of creditor was incomplete</td>
</tr>
<tr>
<td>• Address was incomplete</td>
<td>• Street address for contributor(s) was incomplete</td>
<td>• Support/offer box was not marked</td>
<td>• A code or description of payment was missing</td>
<td>• A code or description of payment was missing</td>
</tr>
<tr>
<td>• Signature missing</td>
<td>• Contributor code was not marked for contributor(s)</td>
<td>• Type of payment was missing</td>
<td>• Outstanding balance at beginning of this period was missing</td>
<td>• Outstanding balance at beginning of this period was missing</td>
</tr>
<tr>
<td>• Treasurer information was incomplete</td>
<td>• Occupation &amp; employer column was left blank or incomplete for individual contributor(s)</td>
<td>• Description (if required) was missing</td>
<td>• Original amount of loan was left blank or incomplete</td>
<td>• Original amount of loan was left blank or incomplete</td>
</tr>
<tr>
<td>• Other - see comments section</td>
<td>• Amount received this period was left blank</td>
<td>• Amount this period was missing</td>
<td>• Date incurred for original loan amount was missing</td>
<td>• Date incurred this period was missing</td>
</tr>
<tr>
<td>• Lines ______ were left blank in column A or B</td>
<td>• Outstanding balance at close of this period was left blank or incomplete</td>
<td>• Cumulative to date column (Jan 1 - Dec 31) was missing</td>
<td>• Cumulative to date column (Jan 1 - Dec 31) was missing</td>
<td>• Outstanding balance at close of this period was missing</td>
</tr>
<tr>
<td>• Other - see comments section</td>
<td>• Interest paid this period was left blank or incomplete</td>
<td>• Summary section was incomplete</td>
<td>• Summary section was incomplete</td>
<td>• Summary section was incomplete</td>
</tr>
<tr>
<td>• Other - see comments section</td>
<td>• Original amount of loan was left blank or incomplete</td>
<td>• Other - see comments section</td>
<td>• Other - see comments section</td>
<td>• Other - see comments section</td>
</tr>
<tr>
<td>• Other - see comments section</td>
<td>• Guarantee information was incomplete</td>
<td>• Other - see comments section</td>
<td>• Other - see comments section</td>
<td>• Other - see comments section</td>
</tr>
</tbody>
</table>

*continued on other side...*
LET’S LEARN ABOUT:

- Statement Logs
- Late Filers
- Enforcement Referrals
- Public Access/Retention of documents
- After Election
- E-Filing
- AB 571 Candidates
STATEMENT LOG

- A tool to determine if statements have been filed
- Select what format that works best for you
- Must be available to the public
<table>
<thead>
<tr>
<th>Form</th>
<th>Period Covered</th>
<th>Due Date</th>
<th>Date Filed</th>
<th># Days Late</th>
</tr>
</thead>
<tbody>
<tr>
<td>501</td>
<td>NA</td>
<td>NA</td>
<td>12/12/XX</td>
<td></td>
</tr>
<tr>
<td>410</td>
<td>NA</td>
<td>NA</td>
<td>3/6/XX</td>
<td></td>
</tr>
<tr>
<td>460</td>
<td>1/1/XX* – 6/30/XX</td>
<td>7/31/XX</td>
<td>8/3/XX</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Semi-Annual</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>460</td>
<td>7/1/XX – 9/30/XX</td>
<td>10/5/XX</td>
<td>10/5/XX</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1st Pre-Election</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>460</td>
<td>10/1/XX – 10/20/XX</td>
<td>10/25/XX</td>
<td>10/24/XX</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2nd Pre-Election</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>460</td>
<td>10/21/XX</td>
<td>1/31/XX</td>
<td>1/15/XX</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Semi-Annual</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Opening date for 1st statement is always 1/1/XX
FINING LATE FILERS

Filing deadlines may not be extended.

Filing officers may impose a full fine, partial fine, or waive the fine.

Develop written guidelines and provide a copy to all candidates and committees.

Begin counting the number of days late on the day after the deadline, not on the day the committee is notified.

Any person filing an original statement after a deadline, is liable of a fine of $10/day until the statement is filed.

Form 470 filers may only be fined $100, maximum.

Deposit fines into agency’s general fund.
MANAGING NON-FILERS

• Refer to your log to determine whether any statements are missing

• Notify non-filers by:
  ▪ Telephone (keep a record of the call)
  ▪ Written Notice (keep a copy of the letter/email)

• Make an enforcement referral if the statement is not filed after you send two written notices
ENFORCEMENT REFERRAL

- Mandatory for filing officers
- Make two notifications to non-filer before referring to FPPC
- Use electronic complaint system
- Answer all questions asked by system
ENFORCEMENT REFERRAL

• Most recently filed campaign statement
• Contact information for candidate and/or committee
• Copies of non-filer notifications
• All relevant information that Enforcement needs to know
PUBLIC ACCESS

- Second business day
- No conditions
- Copies: 10 cents per page
- No redaction on copies provided to the public
Effective January 1, 2021, agencies who DO NOT have an electronic filling system are required, by law, to post filed campaign statements and reports within 72-hours of the applicable filing deadline.

When the 72-hour deadline falls on a Saturday, Sunday or a holiday, the deadline is extended to the next business day.

These posted statements must remain on the agency’s website for 4 years.

Please forward the FPPC a link to the page that contains posted statements (AB2151@fppc.ca.gov). Including when there are changes made to the link.
When campaign statements are posted to the website, the statements must be redacted of the following information before posting*:

- Street name;
- Building number of persons or entity representatives listed on any statement; and
- Bank account number.

* Reminder that this statement is still considered a public document and must be produced unredacted upon request.
Mayors, City Council Members, County Supervisors:
Indefinitely

All “original” campaign statements for other candidates and committees (i.e., school board, water district, ballot measure committees): 7 years

Original campaign statements for defeated non-incumbent candidates: 5 years

All “copies” of campaign statements (i.e. Form 410): 4 years

All electronically filed campaign statements: 10 years

After 2 Years…
May retain on a space-saving device and discard paper. Must still comply with the public access rules and be prepared to provide copies.
### AFTER THE ELECTION

- Check filing schedules for potential due dates
- Committees may terminate once all refunds have been received and all balances zeroed out.

<table>
<thead>
<tr>
<th>Filers</th>
<th>Successful CANDIDATES</th>
<th>Defeated CANDIDATES</th>
<th>BALLOT MEASURE COMMITTEES</th>
<th>GENERAL PURPOSE COMMITTEES</th>
</tr>
</thead>
<tbody>
<tr>
<td>460</td>
<td>Semi-annual until committee terminates</td>
<td>Semi-annual until committee terminates</td>
<td>Semi-annual until committee terminates, and possibly quarterly</td>
<td>Semi-annual until committee terminates, and others during election years</td>
</tr>
<tr>
<td>470</td>
<td>File by July 31 each year filings if public salary is $200 or more/ month</td>
<td>No more filings</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>
TERMINATING A COMMITTEE

• Committees may terminate if they:
  ▪ Have no remaining campaign funds
  ▪ Are not still receiving contributions
  ▪ Are not still making expenditures
  ▪ Are not expecting a refund for filing or ballot statement fees

• Complete forms:
  ▪ 410 (Submit to SOS)
  ▪ 460 (Submit to local filing officer)

• Unsuccessful candidate committees should terminate before funds become surplus (90 days after the end of the semi-annual reporting period)
ELECTRONIC FILING

• Local ordinances for e-filing
• Redaction requirements for internet postings
• Paper filings NOT required in addition to e-filing
Effective January 1, 2021, any local city or county who has not established contribution limits or a “no limit” ordinance, is subject to the state limits ($4,900 through December 2022).

This does not include special districts or school districts, only city and county candidates.

The FPPC is not responsible for enforcing any local contribution limits, but is responsible for enforcement of AB 571 limits.

* To find view our FAQs go to FPPC.ca.gov > Learn > Campaign Rules > Local Campaign Ordinances.
AB 571 RESOURCES

• Local City and County Contribution Limit Webpage
  
  https://fppc.ca.gov/learn/Contribution-Limits-City-and-County-Candidates.html

• Contribution Limits: City and County Candidate Fact Sheet (AB 571)
  
  https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/TAD/Campaign%20Documents/AB_571_Fact_Sheet_Final.pdf

• Terminating Committee Fact Sheet
  
Phone Advice
M-Th 9-11:30 a.m.
1-866-275-3772

E-mail Advice
advice@fppc.ca.gov

Guidance for Filing Officers

Filing officers play an important role in helping to ensure provisions of the Political Reform Act are effectively and efficiently administered. To achieve this goal, the officers are required to perform specified duties under the Act, including providing public access to disclosure statements, following up on those who fail to file, and reviewing filed statements for errors and omissions. The duties are listed in Regulation 18110 for processing campaign statements and Regulation 18115 for processing Statements of Economic Interests (Form 700).

Click on the links below for information about some of the more common filing officer duties. For additional assistance, the FPPC provides several training options for filing officers, including workshops at the FPPC, webinars, online videos, and in-person seminars at your agency. To learn more and pick the training option that best meets your needs, click on the FPPC Training and Outreach link below.
Thank You!

Now onto the final topic – What’s New For Filing Officers!
The visual aids used in FPPC presentations are guides for training only, and contain only highlights of selected provisions of the law. They do not carry the weight of the law.
What We’ll Cover Today

- FPPC Newly Adopted & Pre-Noticed Regulations
- Cryptocurrency
- Filing Officer Referrals
- Prenotice Campaign Regulations
- Prenotice Personal Use Regulation
- Enforcement News
- Website Updates for Transparency
- What’s New!
Cryptocurrency

In July 2022, the Commission adopted Regulation 18421.2 which authorizes candidates and committees to solicit a contribution of cryptocurrency as an in-kind contribution.

This repeals the prior Commission Regulation to prohibit the making or acceptance of cryptocurrency contributions. However, now these contributions are subject to specific requirements as detailed on the next few slide.
Cryptocurrency

• Committees may solicit contributions of cryptocurrency, or virtual currency, in any amount not exceeding any applicable contribution limit.

• While committees cannot receive cryptocurrency contributions directly, committees may receive these types of contributions through a payment processor selected to act as a vendor on behalf of the committee.

• The amount of a cryptocurrency contribution is the fair market value of the cryptocurrency at the time the payment processor obtains possession of the contribution.

• Any cryptocurrency contribution must be made and received through a U.S. based cryptocurrency payment processor registered with the U.S. Department of Treasury, Financial Crimes Enforcement Network.

Regulation 18421.2
In July 2022, the Commission adopted amendments to Regulation 18360 regarding filing officer referrals. The amendments include:

• Providing the email address, mailing address or telephone number at which the referred person or entity was contacted.

• Attempts to contact a referred person who left office or is no longer at an agency should be made to a personal email address, home mailing address, or personal telephone number known by the filing officer if the filer cannot be contacted through an agency email address, phone number, or mailing address.
Filing Officer Referrals – Form 700

• If the filing officer does not have any personal contact information for the filer, the filing officer shall make best efforts to obtain personal contact information for the filer, including requesting the information from the filer.

• If the filer is on leave, provide that information along with the expected return date, if known.

• Before making a referral to the Enforcement Division, the filing officer shall attempt to contact the filer by telephone at least once.

• For 87300 filers, include a copy of the agency’s conflict of interest code.

• If a filing officer subsequently receives a filing from a referred Form 700 filer, the filing officer must notify the Enforcement Division within 7 days of receipt of the filing.

Regulation 18360
Filing Officer Referrals – Campaign

• For campaign non-filer referrals, filing officers must include:
  • A copy of the most recently filed campaign statement, if any, including all relevant schedules.
  • Office sought or held, if applicable
  • Current contact information for the committee, candidate if applicable, and the committee’s treasurer.
  • Filing methods available to the filer at their agency, such as paper or electronic filing.

• If a filing officer subsequently receives a filing from a referred candidate or committee, the filing officer must notify the Enforcement Division within 7 days of receipt of the filing.

Regulation 18360
Prenoticed Campaign Regulations

• Amendments to Regulation 18410
  o If approved, amendments will require disclosure of all individuals authorized to access a committee’s bank account.
  o If approved, this regulation will require changes to the Form 410 to include this information.

• Amendments to Regulation 18531.5
  o If approved, amendments will clarify existing rules regarding recall elections.
    o The target officer of a recall is not required to file a Candidate Form 700.
    o Pre-election reports and 24-hour reports are not required for a target officer’s other controlled committees by virtue of the recall being on the ballot.

• Proposed Regulation 18400
  o If approved, the regulation would prohibit a minor from serving in the role of a campaign committee treasurer, assistant treasurer, or as a responsible officer or principal officer.

*All of these regulations were prenoticed at the Aug 2022 Commission Meeting. They will come before the Commission later this year for final adoption/approval.
Prenoticed Personal Use Regulation

• Amendments to Regulation 18960 applies the definition of a “direct personal benefit” under the Act to recently adopted Sections 89521(b) and 89511(b)(3).
  o Amendments also remove the $200 threshold in Regulation 18960.
  o Recently adopted Section 89521(b) established enhanced penalties for unlawful personal use of campaign funds in the amount of $10,000 or more.
  o Amendments provide a list of persons to whom the regulation applies as identified in Sections 89511(b)(3) and 89521(b).

*This regulation was prenoticed at the July 2022 Commission Meeting. This regulation will come before the Commission in September for final adoption/approval.
Enforcement News

In 2022, FPPC’s Enforcement Division will again run the proactive pre-election filing program to identify committees who do not file timely pre-election statements.

Enforcement will reach out to:

- All counties
- All cities holding elections in June or November (pop. over 100,000)
- Anyone else who would like to participate

Cities meeting the criteria will receive an email at least 90 days before the election explaining the program and again the day after the first and second pre-election deadlines. If a candidate or committee hasn’t filed, FPPC’s Enforcement Division will contact them directly rather than filing officers having to do so. **This program resulted in 100% compliance in the June 2022 Primary Election!**
Local Campaign Ordinances

- Ordinances are posted on FPPC’s website.
- You are required to provide us with most recent ordinances.
- Send updates to advice@fppc.ca.gov.
Form 700 Local Statements

- Links to locally filed Form 700s by jurisdiction posted to FPPC’s website.
- Please send us your links!
- Send updates to form700@fppc.ca.gov.
You are no longer required to send Form 802 to FPPC, but instead, you will post them on your agency’s website and email the link to us at form802@fppc.ca.gov.

Your agency’s ticket policy must be also be posted on your website and a link must be sent to FPPC.

The FPPC will post on its website a link to the page of your agency’s website that contains the ticket policy and the completed 802 forms.

It is not necessary to send an email each time a new Form 802 is posted. After the initial e-mail, it is only necessary to submit the link if the posting location on your website changes.
What’s New is What’s New!

Click on this link at the bottom of our homepage
What’s New is What’s New!

What's New
In an effort to keep you informed regarding new and updated laws, manuals, forms, and other FPPC publications and services, this page will be updated each time changes occur. In most cases, links to updated material will remain for six months after the date of publication.

Campaign Manuals
• The Campaign Disclosure Manuals have been updated through June 1, 2020. They can be found on the Campaign Disclosure Manuals page.

New Fact Sheets
• AB 571 Fact Sheet
• Behested Payment Report Fact Sheet
• Updated Filing Officer and Filing Official Duties Relating to Statements of Economic Interests
• Limited Liability Company Fact Sheet on New Regulations
• Committee Naming Fact Sheet
• Sponsored Committee Qualification and Naming Fact Sheet
• Filing with a Digital Signature Fact Sheet
• An Overview of Conflicts of Interest

Biennial Notices for Multi-County Agencies
• The Act requires every multi-county agency to review its conflict of interest code biennially and notify FPPC by October 1, 2020 as to whether or not the agency’s code needs to be amended. The appropriate documents are posted on the Rules on Conflict of Interest Codes for State and Local Agencies page.
Political Reform Education Program (PREP)

WHAT IS PREP?

PREP is a new educational program created by the Commission!

The purpose of PREP is to allow for education of Respondents who have little or no experience with the Act and commit minor violations, in lieu of monetary penalties.

PREP has launched their first course, Statements of Economic Interests Course, with plans for future courses on other topics, such as local campaign.

PREP has its own webpage www.fppc.ca.gov → Learn → Political Reform Education Program (PREP)
Remember…

- Filing officer campaign duties are noted in Regulation 18110.
- Filing officer Form 700 duties are noted in Regulation 18115.
- Technical questions about FPPC’s Form 700 e-filing system should be sent to form700@fppc.ca.gov.
- Our e-mail and phone Advice teams can answer your customers’ questions about the content of their statements.
  - advice@fppc.ca.gov
  - (866) 275-3772
Thank you for attending today’s training!

If you have any questions, please do not hesitate to contact us at advice@fppc.ca.gov.