

**STATEMENT OF REASONS IN SUPPORT OF ATTORNEY GENERAL
APPROVAL OF PROPOSED AMENDMENTS TO CONFLICT OF INTEREST CODE
FOR FAIR POLITICAL PRACTICES COMMISSION**

The Office of the Attorney General proposes to approve the following amendments to the conflict of interest code of the Fair Political Practices Commission (the “Commission”) for the following reasons:

Executive Office

Associate Governmental Program Analyst and Staff Services Analyst were added to reflect the Executive Office’s current organization and positions and are assigned to category three, which is the disclosure category assigned to Executive Office staff other than category one filers. The positions’ decision making authority is limited and category three requires disclosure of only those interests the position can affect in their decision making. The disclosure category is narrowly tailored to economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission. The positions do not have broad decision making authority so category one is not appropriate. The positions do not participate in enforcement-related decisions or matters so category 2 is not appropriate. The positions will not be making or participating in making purchasing decisions so categories 4 and 5 are not appropriate.

Legal Division

The Staff Services Manager II position was added to reflect the Legal Division’s current organization and is assigned to category three which is the category assigned to all Legal Division staff that are not attorneys. The Staff Services Manager II’s decision making authority is limited and category three requires disclosure of only those interests the Staff Services Manager II can affect in their decision making. Category three is narrowly tailored to economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

Enforcement Division

Chief Investigator was retitled Supervising Special Investigator. The duties of this position have not changed.

Supervising Management Auditor and Program Specialists were moved to the Audits and Assistance Division.

Audits and Assistance Division

The Audits and Assistance Division is a new division and added to reflect the Commission’s current organization.

The Division Chief, like all Division Chiefs in the Commission's code, is assigned to category one. The Division Chief has broad decision-making authority and category one is the most appropriate disclosure category.

The Supervising Management Auditor and Program Specialists that were previously listed in the Enforcement Division are now listed in the Audits and Assistance Division to reflect the Commission's current organization. The duties of these positions have not changed.