

**MEMO# 5818**

April 22, 1994

## **CFPPC ADOPTS REGULATION CONCERNING PERSONS WHO MANAGE CALIFORNIA PUBLIC INVESTMENTS**

April 22, 1994 TO: INVESTMENT ADVISER ASSOCIATE MEMBERS NO. 17-94 INVESTMENT ADVISERS COMMITTEE NO. 31-94 RE: CFPPC ADOPTS REGULATION CONCERNING PERSONS WHO MANAGE CALIFORNIA PUBLIC INVESTMENTS

\_\_\_\_\_ In 1990, California Government Code Section 87200 was amended to add city treasurers, county treasurers, and other public officials who manage public investments to the list of persons who must file Commission Form 721, Statement of Economic Interests, with the California Fair Political Practices Commission ("CFPPC"). Since then, there has been considerable confusion about the scope of the term "other public officials who manage public investments", and whether it includes investment advisers who render services to California municipalities and other public entities. The CFPPC recently adopted Regulation 18720 under the Government Code to define this category of persons. The regulation is expected to become effective in early June. Regulation 18720 defines "other public officials who manage public investments" as (1) members of boards and commissions who exercise responsibility for the management of public investments, (2) high-level public officers and employees who exercise primary responsibility for the management of public investments and (3) "individuals [private contractors] who, pursuant to a contract with a state or local government agency, perform the same or substantially all the same functions that would otherwise be performed by [such high-level public officers and employees]." A copy of new Regulation 18720 is attached. Amy B.R. Lancellotta Associate Counsel Attachment