

JUDICIAL COUNCIL OF CALIFORNIA
ADMINISTRATIVE OFFICE OF THE COURTS
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Report

TO: Members of the Judicial Council

FROM: Office of the General Counsel
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DATE: January 25, 2005

SUBJECT: Conflict of Interest Codes for Administrative Office of the Courts
and Habeas Corpus Resource Center (Action Required)

Issue Statement

Since the Administrative Office of the Courts' and the Habeas Corpus Resource Center's Conflict of Interest Codes were last amended, 26 job classifications have been created at the two agencies. All but one of the new classifications for the AOC are in the Office of Court Construction and Management; the remaining position is in the Executive Office. Staff determined that these classifications need to be added to the codes to bring them up to date. Staff also identified the types of financial interests that employees in these classifications should be required to disclose. In accordance with Government Code section 87303 and 87306, the Judicial Council must review the amended codes.

Recommendation

Administrative Office of the Courts (AOC) staff recommends that the Judicial Council, effective February 18, 2005, adopt:

1. the proposed revision of the AOC Conflict of Interest Code, which adds 23 new job classifications and one existing classification, moves three classifications to a new division with a new disclosure category, moves two other classifications to a new division, amends an existing disclosure category, and changes the name of a committee to its current title; and
2. the revised Habeas Corpus Resource Center (HCRC) Conflict of Interest Code, which adds three new classifications and a new disclosure category.

The text of the proposed AOC code is attached at pages 7–18. The text of the proposed HCRC code is attached at pages 19–21.

Rationale for Recommendation

The Political Reform Act of 1974 (Gov. Code, § 81000 et seq.) requires public agencies to adopt conflict of interest codes. (Gov. Code, § 87300.) In 1984, the Legislature amended the Political Reform Act to require agencies and employees of the judicial branch to comply with the act. (Stats. 1984, ch. 727, amending Gov. Code, §§ 82011, 82041, 82048, 82049, and 87200 and adding Gov. Code, § 87311.5.) Every conflict of interest code, including amended codes, must be submitted to and approved by a “code-reviewing body.” (Gov. Code, §§ 87303, 87306.) The Judicial Council is the code-reviewing body for “any state agency within the judicial branch of government” where no other code-reviewing body has been specified (Gov. Code, § 82011(h)), which includes the AOC and the HCRC. In 1985, the Judicial Council approved a conflict of interest code for AOC employees. An agency’s conflict of interest code must be amended when new positions and duties are created. (Gov. Code, § 87306.)

A conflict of interest code is a document that sets forth the rules and procedures by which designated officers and employees of a public agency must disclose certain personal financial interests. The financial interests required to be disclosed are those that foreseeably could be materially affected by decisions that these officers or employees are authorized to make or to influence.

In brief, a conflict of interest code must:

- Designate the classifications of officers or employees who make or influence financial decisions (“designated employees”);
- Identify the categories of interests that foreseeably may be affected by such decisions (“disclosure categories”);
- Require officers and employees to file periodic reports of their financial interests (“disclosure statements”); and
- Require officers and employees to disqualify themselves from decisions affecting matters in which they have a financial interest.

(Gov. Code, § 87302.)

A conflict of interest code must designate the officers and employees who make, or participate in the making of, government decisions that foreseeably can have a material effect on their personal financial interests. (Gov. Code, § 87302(a).) The disclosure categories for each job classification must correspond to those interests that employees foreseeably can affect. (Gov. Code, § 87302(c).) Thus, disclosure

categories reflect the powers and responsibilities assigned to employees within each job classification.

The current AOC Conflict of Interest Code contains 19 disclosure categories. The broadest, Category 1, provides for disclosure of “[a]ll investments, sources of income, interests in real property, and positions in business entities.” Those who fall within this category include the Administrative Director of the Courts, the Chief Deputy Director, the regional administrative directors, the division directors, and the assistant division directors.¹ Other employees must disclose a narrower range of financial interests that could be affected as a result of their specific job duties. For example, certain employees in the Office of Communications and the Administrative Services Unit must disclose “[i]nvestments, sources of income, and business positions in business entities that are providers of printing, graphics hardware and software, duplicating, and publishing services, equipment, and supplies” (Category 3).

New AOC classifications

The new classifications in the Office of Court Construction and Management (OCCM) are:

1. Computer-Aided Facilities Management (CAFM) Application Analyst;
2. Supervising Construction Inspector;
3. Senior Construction Inspector;
4. Construction Inspector;
5. California Environmental Quality Act (CEQA) Compliance Specialist;
6. Occupational Safety and Health Administration (OSHA) Compliance Analyst;
7. Accessibility Compliance Officer;
8. Utility Engineer/Analyst;
9. Supervising Facilities Manager;
10. Facilities Manager;
11. Regional Manager of Facility Operations;
12. Senior Manager;
13. IS/Technical Liaison;
14. County Liaison;
15. Staff Analyst;
16. Supervising Project Architect–Project Manager;
17. Senior Scheduling Specialist;
18. Scheduling Specialist;
19. Portfolio Manager;

¹ A few other positions at the AOC, such as contract specialists in the Finance Division, require disclosure under Category 1 owing to the level of authority those staff exercise.

20. Portfolio Administration Analyst;
21. Relocations Coordinator;
22. Contract Specialist

The responsibilities of all of these new positions involve a certain degree of independence. These employees are responsible for reviewing contracts related to the development and renovation of court facilities and providing advice and recommendations on the hiring of consultants. There is an existing disclosure category applicable to the OCCM (Category 19) that requires disclosure of investments in business entities that provide commercial furniture, fixtures, design services, construction products and services, real estate services, and services, equipment, or goods related to the operation and maintenance of facilities. We recommend that all the new classifications in this division be subject to this disclosure category.

The new classification in the Executive Office is Senior Emergency Response and Planning Manager. The person holding this position is responsible for ensuring the continuity of operations in the courts in the event of a disaster. Among other responsibilities, he or she will be charged with procuring and managing outsource contracts as well as emergency response-related training and implementation work. Because this employee will be working with the OCCM, we recommend disclosure of investments in business entities that provide services, equipment, and goods related to the operation and maintenance of facilities, and other services of the type used by the OCCM (Category 19). This employee will also be involved with designing and procuring security systems and equipment. Thus, we also recommend disclosure of investments in business entities that provide building and court security services, supplies, and equipment (Category 11). Finally, because of this employee's responsibility for continuity of operations, he or she may be involved in making decisions about telecommunications services. Therefore, we recommend disclosure of investments in business entities that provide telecommunications services (Category 6).

Existing AOC classifications

Three existing classifications have been transferred from the Finance Division to the OCCM: Supervising Facilities Planner, Senior Facilities Planner, and Facilities Planner. Therefore, we recommend that the code be amended to reflect these changes and that the classifications be assigned to the disclosure category applicable to the OCCM (Category 19).

Two existing classifications have been transferred from the Administrative Services Unit to the Executive Office Programs Division: Supervising Editor and Senior Editor. Therefore, we recommend that the code be amended to reflect the transfer. The disclosure category need not be changed.

Two classifications currently listed under the Education Division require a new disclosure category to accurately reflect staff responsibilities. The two classifications—Supervising A/V-Video Systems Technical Analyst and Senior A/V-Video Systems Technical Analyst—involve developing specifications for audiovisual video and audio systems and equipment in new and refurbished judicial branch facilities. These employees will purchase audiovisual equipment and hire consultants for training rooms, model courtrooms, and other courtrooms in judicial branch facilities. Currently, these employees must disclose investments in “business entities that are providers of equipment, supplies, and services of the type used by the Education Division in producing judicial education materials and programs, including computer and audio-video equipment” (Category 9). Because their responsibilities extend to purchasing and developing information systems and audiovisual presentation equipment, systems, and software, we recommend that they also be required to report under Category 6.

Category 6 currently requires disclosure of investments in entities that are providers of “information systems hardware and/or software, telecommunications services, records management equipment, and information system consulting services.” To make the category relevant to those who hold these positions, we recommend that Category 6 be amended to include audio, video, and audiovisual presentation equipment, systems, and software and audiovisual consulting services. As amended, Category 6 will read as follows: “Investments, sources of income, and business positions in business entities that are providers of “information systems hardware and/or software, telecommunications services, records management equipment, audio, video, and audiovisual presentation equipment, systems, and software, and information system and audiovisual consulting services.”

We also recommend adding an existing classification—A/V-Video Systems Technical Analyst—to the code because the person holding this position will perform many of the same duties as staff in the senior and supervising positions.

Finally, the current code requires members of the Judicial Branch Budget Advisory Committee to disclose investments in entities that provide consulting, surveying, or research services on matters relating to trial court budgets. Effective December 10, 2004, that advisory committee was officially dissolved. Some of the duties and responsibilities of the committee have been assumed by the Trial Court Budget Working Group, including making recommendations on methodologies for allocating trial court budget augmentations and reductions and on the allocation of trial court funding. We recommend that the code be amended to reflect the new title of the group.

New HCRC classifications

The new classifications in the HCRC are Administrative Coordinator, Research and Information Management Specialist, and Senior Business Systems Analyst. Among other duties, the administrative coordinator works with vendors to procure goods and services for the HCRC. We therefore recommend that this employee be required to disclose investments in business entities that are providers of equipment, supplies, and services of the type used by the HCRC (Category 3 of the HCRC code).

The research and information management specialist recommends new technologies appropriate to HCRC's needs in the areas of library, research, and information management. This employee also evaluates and recommends the purchase of library and document management automation software and equipment and signs license agreements for access to external databases. Likewise, the senior business systems analyst works with vendors to resolve software problems and evaluate new products and software tools and recommends new technologies appropriate to judicial branch needs. To ensure that these employees disclose investments in business entities associated with the type of duties they perform, we recommend adding an additional disclosure category to the HCRC's code that would track the AOC's disclosure category for these positions. The new category, which would be designated Category 4, would be the same as the AOC's Category 6 (see page 5 above).

Alternative Actions Considered

None.

Comments From Interested Parties

Staff from each of the AOC divisions affected by the amendments to the AOC code were consulted about the proposed amendments and the disclosure categories.

Implementation Requirements and Costs

There are no implementation requirements or costs.

Attachments

**CONFLICT OF INTEREST CODE FOR THE
ADMINISTRATIVE OFFICE OF THE COURTS**
(Revised effective ~~December 5~~February 18, 2003~~2005~~)

The Political Reform Act (Gov. Code, § 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (Cal. Code of Regs., tit. 2, § 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference into an agency's code. After public notice and hearing, the code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of California Code of Regulations, title 2, 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 appendixes designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of the Administrative Office of the Courts.

Designated employees shall file statements of economic interests with the secretary of the Judicial Council (Administrative Director of the Courts) on forms prescribed by the Fair Political Practices Commission.

APPENDIX A: DESIGNATED CLASSIFICATIONS

List of Designated Classifications	Assigned Disclosure Categories
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Office of the General Counsel

General Counsel/Deputy Administrative Director	1
Assistant General Counsel	1
Managing Attorney	2
Supervising Attorney	2
Senior Attorney	2
Attorney	2
Associate Attorney I, II	2
Research Attorney A, B	2
Senior Court Services Analyst	2

Executive Office Programs Division

Division Director	1
Assistant Division Director	1
Senior Manager	5, 6, 15
Public Information Officer	3
Manager (Office of Communications)	3, 6
Manager (Research and Planning)	5, 6, 15
Supervising Administrative Coordinator	7
Supervising Research Analyst	5, 6, 15
Senior Research Analyst	15
Judicial Administrative Librarian	5
Supervising Communications Specialist	3
Manager (Presiding Judges and Court Executives)	6, 12
Supervising Court Services Analyst	12
Senior Court Services Analyst	12
Supervising Editor	3
Senior Editor	3

Administrative Services Unit

Manager	3, 6, 10
Support Services Supervisor	3
Supervising Editor	3
Senior Editor	3
Meeting and Conference Services Supervisor	7
Production and Mail Services Supervisor	3
Senior Administrative Coordinator (travel and meeting planner)	7
Administrative Coordinator I, II (travel and meeting planner)	7

Finance Division

Division Director	1
Assistant Division Director	1
Manager	1
Supervising Contract Specialist	1
Senior Contract Specialist	1
Contract Specialist	1
Business Services Supervisor	1
Business Services Technician I, II	3, 10
Facilities Management Specialist	6, 10
Supervising Facilities Planner	9
Senior Facilities Planner	9
Facilities Planner	9
Supervising Internal Auditor	18
Senior Internal Auditor	18
Internal Auditor	18

Human Resources Division

Division Director	1
Assistant Division Director	1
Senior Manager	4, 6, 12
Manager	4, 6, 12
Supervising Human Resources Analyst	4
Senior Human Resources Analyst	4
Human Resources Analyst	4
Supervising Court Services Analyst	12
Senior Court Services Analyst	12

Linguistics Analyst 4, 12

Information Services Division

Division Director	1
Assistant Division Director	1
Senior Manager	6
Information Systems Manager	6
Supervising Information Systems Analyst A, B	6
Senior Business Systems Analyst	6
Senior Web Analyst	6
Senior Application Development Analyst	6
Supervising Research Analyst	6
Senior Research Analyst	6
Records Management Supervisor	6
Administrative Coordinator I, II (materials acquisition)	6
Senior Technical Analyst	6

Center for Families, Children & the Courts

Division Director	1
Assistant Division Director	1
Manager	1
Managing Attorney	2
Supervising Attorney	2
Senior Attorney	2
Attorney	2
Associate Attorney I, II	2
Research Attorney A, B	2
Supervising Court Services Analyst	12
Senior Court Services Analyst	12
Supervising Research Analyst	12
Senior Research Analyst	12

Executive Office

Administrative Director of the Courts	1
Chief Deputy Director	1
Regional Administrative Director	1
Senior Security Coordinator	11
Security Coordinator	11
Executive Office Liaison	10, 15
Senior Emergency Response and Planning Manager	6, 11, 19

Appellate and Trial Court Judicial Services

Managing Attorney	6, 14
Supervising Court Services Analyst	6, 14
Senior Court Services Analyst	14
Management and Program Analyst	14

Education Division

Division Director	1
Assistant Division Director	1
Manager	3, 4, 6, 7, 8
Managing Attorney	3, 4, 7, 8
Supervising Attorney	3, 4, 7, 8
Senior Attorney	3, 4, 7, 8
Attorney	3, 4, 7, 8
Associate Attorney I, II	3, 4, 7, 8
Research Attorney A, B	3, 4, 7, 8
Supervising Administrative Coordinator	7
Senior Administrative Coordinator (travel and meeting planner)	7
Administrative Coordinator I, II (travel and meeting planner)	7
Support Services Supervisor	4, 8
Supervising Editor	3
Senior Editor	3
Supervising Education Specialist	3, 4, 7, 8
Senior Education Specialist	3, 4, 7, 8
Education Specialist I, II	3, 4, 7, 8
Supervising A/V-Video Technician	8
Supervising Video Producer Director	8
Video Producer Director I, II	8
Supervising Media Production Specialist	8

Senior Media Production Specialist	8
Supervising A/V-Video Systems Technical Analyst	<u>6, 8</u>
Senior A/V-Video Systems Technical Analyst	<u>6, 8</u>
<u>A/V-Video Systems Technical Analyst</u>	<u>6, 8</u>
Media Production Specialist	8

Office of Governmental Affairs

Division Director	1
Assistant Division Director	1
Manager	6, 13
Supervising Attorney	2
Senior Attorney	2
Attorney	2
Associate Attorney I, II	2
Research Attorney A, B	2
Supervising Governmental Affairs Analyst	13

Office of Court Construction and Management

Division Director	1
Assistant Division Director	1
Manager	19
Supervising Real Estate Analyst	19
Senior Real Estate Analyst	19
Real Estate Analyst	19
Structural Engineer	19
Mechanical, Electrical, Plumbing Engineer	19
Environmental Analyst	19
Industrial Hygienist	19
Senior Cost Estimator	19
Cost Estimator	19
Construction Manager	19
<u>Supervising Project Architect—Project Manager</u>	<u>19</u>
Senior Project Architect—Project Manager	19
Project Architect—Project Manager	19
Specifications Specialist	19
Senior Emergency Response and Planning Manager	19
Inventory Controller	19
Senior Facilities Risk Manager	19
Budget Analyst	19
Court Facilities Analyst	19
<u>Supervising Facilities Planner</u>	<u>19</u>

Senior Facilities Planner	19
Facilities Planner	19
Computer-Aided Facilities Management (CAFM)	19
<u>Application Analyst</u>	
Supervising Construction Inspector	19
Senior Construction Inspector	19
Construction Inspector	19
California Environmental Quality Act (CEQA) Compliance	19
<u>Specialist</u>	
Occupational Safety and Health Administration (OSHA)	19
<u>Compliance Analyst</u>	
Accessibility Compliance Officer	19
Utility Engineer/Analyst	19
Supervising Facilities Manager	19
Facilities Manager	19
Regional Manager of Facility Operations	19
Senior Manager	19
IS/Technical Liaison	19
County Liaison	19
Staff Analyst	19
Senior Scheduling Specialist	19
Scheduling Specialist	19
Portfolio Manager	19
Portfolio Administration Analyst	19
Relocations Coordinator	19
Contract Specialist	19

Regional Offices

Manager	1
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All Divisions and Bureaus

Special Consultant*	1
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Judicial Council Advisory Committees

Judicial Branch Budget Advisory Committee Members	16
Trial Court Budget Working Group Members	16
Family and Juvenile Law Advisory Committee Members	17

* The Administrative Director of the Courts may determine and state in writing that a consultant is hired to perform a limited range of duties and that the consultant is not required to comply with broad disclosure requirements. The statement must include a description of the consultant's duties and the extent of disclosure required. The consultant must comply with all other provisions of this code.

APPENDIX B: DISCLOSURE CATEGORIES

Note: In this appendix, “positions” includes employee, partner, officer, director, trustee, and any other management position. “Providers” includes business entities and individuals that are manufacturers, distributors, vendors, sellers, lessors, suppliers, contractors, subcontractors, and other providers of the supplies, equipment, real property, and services indicated in the category.

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| Category 1 | All investments, sources of income, interests in real property, and positions in business entities. |
| Category 2 | Investments, sources of income, interests in real property, and positions in business entities as follows: If during a reporting period a designated employee in this category did not participate in an assignment in which he or she had a financial interest, the employee shall sign a statement to that effect under penalty of perjury. Employees who disqualified themselves from participating in an assignment in which they had a financial interest shall disclose that assignment and that interest in a statement signed under penalty of perjury. This statement shall be filed on form FPPC-1. |
| Category 3 | Investments, sources of income, and business positions in business entities that are providers of printing, graphics hardware and software, duplicating, and publishing services, equipment, and supplies. |
| Category 4 | Investments, sources of income, and business positions in business entities that are providers of recruitment advertising and media services, personnel and employment services, employee payroll and benefits services, organization development and employee education services, and human resources consulting. |
| Category 5 | Investments, sources of income, and business positions in business entities that are providers of publications, materials, equipment, and software of the type generally used by law libraries. |

- Category 6 Investments, sources of income, and business positions in business entities that are providers of information systems hardware and/or software, telecommunications services, records management equipment, audio, video, and audiovisual presentation equipment, systems, and software, and information system and audiovisual consulting services.
- Category 7 Investments, sources of income, and business positions in business entities that are providers of conference facilities, food services, travel services, hotel services, and audiovisual services and equipment.
- Category 8 Investments, sources of income, and business positions in business entities that are providers of equipment, supplies, and services of the type used by the Education Division in producing judicial education materials and programs, including computer and audio-video equipment.
- Category 9 Investments, sources of income, and business positions in business entities that are providers of supplies, equipment, real property, and services of a type used by the AOC or the appellate courts within the past two years, including, but not limited to, library, building maintenance, and security services, supplies, and equipment.
- Category 10 Investments, sources of income, and business positions in business entities that are providers of office and business equipment, furniture, supplies, and services.
- Category 11 Investments, sources of income, and business positions in business entities that are providers of building and court security services, supplies, and equipment.
- Category 12 Investments, sources of income, and business positions in business entities that are providers of consulting and training services of a type used by the Executive Office Programs Division, the Center for Families, Children & the Courts, or the Human Resources Division.

- Category 13 Investments, sources of income, and business positions in business entities that are providers of equipment, supplies, and services of the type used by the Office of Governmental Affairs.
- Category 14 Investments, sources of income, and business positions in business entities that are providers of equipment, supplies, and services of the type used by the Appellate and Trial Court Judicial Services Division.
- Category 15 Investments, sources of income, and business positions in business entities that are providers of consulting services that provide data gathering or policy analysis to assist in the enhancement of court administration and judicial branch policy decisions.
- Category 16 All investments and business positions in, and income from, business entities or nonprofit organizations that (1) provide consulting, surveying, or research services on matters relating to trial court budgets or (2) provide services, supplies, materials, machinery, or equipment of a type utilized by the trial courts.
- Category 17 All investments and business positions in, and income from, business entities or nonprofit organizations that (1) provide consulting, surveying, or research services on matters relating to family or juvenile law or (2) receive, or will be likely to receive, Judicial Council grant funding based on a recommendation from the member's advisory committee.
- Category 18 All investments, sources of income, interests in real property, and positions in business entities that are providers of services, materials, or information to the judicial branch and would be subject to review or examination by the Audit Unit.

Category 19

All investments, sources of income, interests in real property, and positions in business entities that are providers of commercial furniture, fixtures, design services, construction products and services, real estate services, services, equipment, or goods related to the operation and maintenance of facilities, and other services of the type used by the Office of the Court Construction and Management.

**CONFLICT OF INTEREST CODE FOR THE
HABEAS CORPUS RESOURCE CENTER**
(Effective ~~December 18~~ February 18, 2004~~2005~~)

The Political Reform Act (Gov. Code, § 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (Cal. Code of Regs., tit. 2, § 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of California Code of Regulations, title 2, 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 appendixes designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of the Habeas Corpus Resource Center.

Designated employees shall file statements of economic interests with the secretary of the Judicial Council (Administrative Director of the Courts) on forms prescribed by the Fair Political Practices Commission.

APPENDIX A: DESIGNATED CLASSIFICATIONS

List of Designated Classifications	Assigned Disclosure Categories
Member, Board of Directors	1
Executive Director	1
Deputy Director	1
Assistant Director	1
Special Consultant	1*
Senior Habeas Corpus Counsel	2
Habeas Corpus Counsel I, II, III	2
Staff Attorney I, II, III	2
Mitigation Specialist	2
Senior Habeas Corpus Investigator	3
Senior Paralegal	3
Administrative Coordinator	3
<u>Research and Information Management Specialist</u>	<u>4</u>
<u>Senior Business Systems Analyst</u>	<u>4</u>

* The executive director may determine and state in writing that a consultant is hired to perform a limited range of duties and that the consultant is not required to comply with broad disclosure requirements. The statement must include a description of the consultant's duties and the extent of disclosure required. The consultant must comply with all other provisions of this code.

APPENDIX B: DISCLOSURE CATEGORIES

Note: In this appendix, “positions” includes employee, partner, officer, director, trustee, and any other management position. “Providers” includes business entities and individuals that are manufacturers, distributors, vendors, sellers, lessors, suppliers, contractors, subcontractors, and other providers of the supplies, equipment, real property, and services indicated in the category.

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| Category 1 | All investments, sources of income, interests in real property, and positions in business entities. |
| Category 2 | Investments, sources of income, interests in real property, and positions in business entities as follows: If during a reporting period a designated employee in this category did not participate in an assignment in which he or she had a financial interest, the employee shall sign a statement to that effect under penalty of perjury. Employees who disqualified themselves from participating in an assignment in which they had a financial interest shall disclose that assignment and that interest in a statement signed under penalty of perjury. This statement shall be filed on form FPPC-1. |
| Category 3 | Investments, sources of income, and business positions in business entities that are providers of equipment, supplies, and services of the type used by the Habeas Corpus Resource Center. |
| Category 4 | <u>Investments, sources of income, and business positions in business entities that are providers of information systems hardware and/or software, telecommunications services, records management equipment, audio, video, and audiovisual presentation equipment, systems, and software, and information system and audiovisual consulting services.</u> |