

**Q: What is a Statement of Economic Interest (SEI)?**

A: A Statement of Economic Interest is a public financial disclosure form which requires public officials to disclose income, investments, and interests in real property described in their department's Conflict of Interest (COI) Code. SEIs are filed in the form of a CA Form 700 by *designated filers* (see definition below). However, certain filers such as elected officials, general managers, and board/commission members must also file a CEC Form 10 or 11 as an addendum to the Form 700. The purpose of SEI forms is to alert public officials to their own economic interests and potential areas of conflict in relation to their official duties. They also provide information to members of the public who may monitor official actions for any conflicts.

**Q: What is a Conflict of Interest Code?**

A: A Conflict of Interest Code is a set of regulations that alerts public officials and members of the public to the types of financial interests that may create, or appear to create, conflicts of interest. A COI Code is promulgated for each City department by the City Council, in accordance with the California Political Reform Act. Based on their respective level of decision-making authority, every City department's COI Code designates positions that are required to file SEIs and assigns disclosure categories specifying the types of interests to be reported, such as investments, interests in real estate, or sources of income or gifts. More specifically, a COI Code consists of three components:

Main Body

An introductory section for each City department's individualized COI Code which codifies state regulations and provisions relating to financial disclosure and conflicts of interest by reference. This section of the COI Code is the same for all City departments.

Schedule A

A list of your department's "designated positions" - classifications of employees who are charged with making or participating in making governmental decisions and are, therefore, required to file Statements of Economic Interests. This section of a COI Code is customized for each department.

Schedule B

A list of your department's "disclosure categories." This section of a COI Code is customized for each department.

**Q: What is a Designated Filer?**

A: A designated filer is an individual who occupies a designated position on Schedule A of a COI Code. Designated filers are required to file SEIs.

**Q: What are Disclosure Categories?**

A: Disclosure categories, found on Schedule B of a Conflict of Interest Code, are the numbered categories that are linked to the designated positions listed on Schedule A. Disclosure categories specify the types of financial interests that must be reported on SEIs by designated filers and are based on their level and type of decision-making authority.

**Q: How will my department's designated filers know what to disclose on their SEIs?**

A: To know what financial interests to disclose, designated filers must review their position's assigned disclosure category. To find their disclosure category, they must first locate their position title and its corresponding category number on Schedule A of your department's COI Code. They will then use the number to locate their disclosure category on Schedule B. Detailed instructions for your filers are located in the Filing Materials tab of this Manual.

**Q: How do I obtain a list of my department's designated filers?****A: If your SEI Index is up-to-date:**

Log in to the SEI Index and print a roster of your department's designated filers (please refer the SEI Index User Guide, located in the SEI Index tab of this Manual). This roster should serve as a list of your department's current filers.

**If your SEI Index is not up-to-date:**

You will need to work with your department's human resources division to determine which of your department's employees inhabit positions listed on Schedule A of your Conflict of Interest Code. You should create a list of your department's designated filers based on this information and update your SEI Index accordingly. Filers who are new or who have left your department may need to file a assuming or leaving office SEI. Please consult the Assuming & Leaving SEIs tab of this Manual for instructions on how and when to solicit those SEIs.

**Q: What are Article II Filers?**

A: Article II filers (*Political Reform Act § 87200*) are individuals who satisfy any of the below criteria:

1. They hold any of the following positions: Mayor, City Council member, City Attorney, Chief Administrative Officer, City Treasurer, City Planning Commissioner.
2. They are a board member/commissioner who exercises the responsibility for the management of public investments.
3. They are an employee who exercises primary responsibility for the management of public investments, i.e., chief or principal investment officer or chief financial manager.
4. They, pursuant to a contract with your agency, perform the same functions as a high-level official or employee who exercises primary responsibility for the management of public investments.

Article II Filers are typically not listed in Schedule A of departmental COI Codes. However, as high-level officials who meet this criteria, they are automatically required to file SEIs at the broadest disclosure category.

**Q: What happens if a designated filer submits their form(s) late?**

A: The City Ethics Commission and the Fair Political Practices Commission (FPPC) have the authority to levy fines when an SEI is not filed on time. Fines for the late filing of CA Form 700 are \$10/day, with a maximum fine of \$100. Fines for the late filing of CEC Forms 10 and 11 are \$25/day, with no maximum fine. The FPPC also has the authority to levy administrative fines of up to \$5,000 per violation for failing to file SEIs.