

CALIFORNIA GAMBLING CONTRTOL COMMISSION
CONFLICT OF INTEREST CODE
JUSTIFICATION FOR AMENDMENTS

Non-Substantive Changes

The proposed amended code contains several non-substantive changes such as an update of the current address of the Commission and changing the titles of the Executive Secretary to Executive Director and Assistant Executive Secretary to Deputy Executive Director to conform to Gambling Control Act amendments

Substantive Changes

Appendix A has been reformatted and substantively changed from the current Code that was originally written in 2001 when there were approximately seven positions in total, four of them Commissioners. Most current positions were created after September 2001. The amended Appendix A replaces general job headings with specific position titles for each respective division within the Commission and assigns disclosure categories for each of the designated positions.

1. The change of title of the Executive Secretary and Assistant Executive Secretary is addressed above as a non-substantive change.
2. The Code is being amended to include the position Deputy Director. This position did not exist when the 2001 Code was drafted. The Deputy Director, Division of Legislative & Public Affairs, is responsible for the development and management of legislative program and advises the Commission on legislative matters. The Deputy Director, Support Services Division, is responsible for the planning, research, and administrative support activities for the Commission. The Deputy Director, Licensing Division, is responsible for the formulation, implementation and administration of departmental policies of licensing program activities. The Deputy Director, Compliance Division, is responsible for the administration and implementation of the fiduciary responsibilities associated with the Indian Gaming Revenue Sharing Trust Fund, the Indian Gaming Special Distribution Fund, and the field-testing of electronic gaming devices.
3. The 2001 general job heading of "all Managers" is being amended to the position title of Staff Services Manager under their respective divisions. The Staff Services Manager I, Licensing Division, functions as the Commission's authority on and coordinator of gambling license application approval, denial, conditional, suspension, and revocation process. The Staff Services Manager I, Support Services Division, coordinates planning, research and administrative support activities for the Commission.

4. The general job heading of “all counsel” is being amended to the position titles of Staff Counsel and Staff Counsel III under the Legal Division. The Staff Counsel and Staff Counsel III advise Commission Members and staff on the authority, responsibilities, and obligations of the Commission pursuant to the State-Tribal Gaming Compacts, and other applicable statutes and regulations.
5. The Code is being amended to delete Administrative Law Judges because this position does not exist at the Commission. Administrative Law Judges are employed by the Office of Administrative Hearings, and are subject to the filing requirements of the Office of Administrative Hearings’ Conflict of Interest Code.
6. The Code is being amended to include the position Staff Management Auditor. This position serves as lead auditor and is responsible for conducting internal fiscal and administrative reviews to ensure the integrity of the Special Distribution Fund receipts and distributions, and receipts and distributions of the Revenue Sharing Trust Fund. This position did not exist when the 2001 Code was drafted.
7. Disclosure Category I is being amended to make specific what is to be disclosed within the jurisdiction of the State of California.
8. The Code is being amended to include the position Staff Services Analyst. The Staff Service Analyst, Legal Division, is responsible for the organization of all Commission litigation information and assists with the conduct of quasi-judicial hearings. The Staff Service Analyst, Division of Legislative and Public Affairs, provides consultative advice to Commission staff and develops research in support of the Commission’s gambling oversight function. The Staff Service Analyst, Support Services Division, performs the administrative functions for the Commission, including fiscal and budget services support. The Staff Service Analyst, Licensing Division, reviews and prepares final written recommendations for administrative approval on all types of licenses, registrations, work permits, and restricted transactions submitted by applicants. The Staff Services Analyst, Support Services Division, performs the administrative functions for the Commission, including fiscal and business services support.
9. The Code is being amended to include the position Senior Programmer Analyst. This position did not exist when the 2001 Code was drafted. The Senior Programmer Analyst functions as a project leader in the development of data processing and technical applications for the Commission’s oversight function.

10. The Code is being amended to include the position Systems Software Specialist. This position did not exist when the 2001 Code was drafted. The Systems Software Specialist provides information technology support and security in networking systems administration.
11. The Code is being amended to include the position Associate Governmental Program Analyst. This position did not exist when the 2001 Code was drafted. The Associate Governmental Program Analyst, Support Services Division, performs the administrative functions for the Commission, including fiscal and business services support. The Associate Governmental Program Analyst, Licensing Division, provides program support in processing and reviewing recommendations from the Division of Gambling control for issuance of a state gambling license, work permits and restricted transactions. The Associate Governmental Program Analyst, Legal Division, is responsible for the organization of all Commission litigation information and assists with the conduct of quasi-judicial hearings. The Associate Program Governmental Analyst, Division of Legislative and Public Affairs, provides consultative advice to Commission staff and develops research methodology in support of the Commission's gambling oversight function.
12. The Code is being amended to include the position Senior Accounting Officer. This position did not exist when the Code was drafted in 2001. The Senior Accounting Officer is responsible for monitoring and reconciling the Revenue Sharing Trust Fund, the Special Distribution Fund and the Gambling Control Fund.
13. The Code is being amended to include the positions Senior Management Auditor, Staff Management Auditor, Associate Management Auditor, and Staff Services Management Auditor. These positions did not exist when the Code was drafted in 2001. The auditor positions duties include auditing and distribution of funds held by the Commission in trust for the benefit of Indian tribes.
14. The Code is being amended in include the position Associate Budget Analyst. This position did not exist when the Code was drafted in 2001. The Associate Budget Analyst is responsible for the preparation and maintenance of the Commission's budget including development of budget proposals, ongoing expenditure and revenue analysis and projections, and position control as well as performs the administrative functions for the Commission, including fiscal and business services support.
15. The Code is being amended to include the position Associate Information System Analyst (Specialist). This position did not exist when the Code was drafted in 2001. The Associate Information System Analyst

(Specialist) provides information technology support and security in networking systems administration.

16. The Code is being amended to include the position Management Services Technician. This position did not exist when the Code was drafted in 2001. The Management Services Technician, Licensing Division, reviews and processes applications for licensure, registration and work permits for the various programs regulated by the Commission. The Management Services Technician, Compliance Division, provides program support to the Field Testing Program.
17. The Code is being amended to include the position Associate Personnel Analyst. This position did not exist when the Code was drafted in 2001. The Associate Personnel Analyst is responsible for processing various personnel transactions involving Commission employees and officers.