

ATTACHMENT C

SPECIAL DISTRICT

- Central County Fire Department
 - Coastside Fire Protection District
 - FireNet Six JPA
 - Silicon Valley Clean Water
-
- South Bayside Waste Management Authority
 - Transit District

2018 Local Agency Biennial Notice

Name of Agency: Central County Fire Department
Mailing Address: 1001 Laurel Street, Suite A, San Carlos, CA 94070
Contact Person: Jean Savaree, Dept. Gen. Counsel Phone No. (650) 593-3117
Email: jbs@adcl.com Alternate Email: mcardinale@adcl.com

Accurate disclosure is essential to monitor whether officials have conflicts of interest and to help ensure public trust in government. The biennial review examines current programs to ensure that the agency's code includes disclosure by those agency officials who make or participate in making governmental decisions.

This agency has reviewed its conflict of interest code and has determined that (*check one BOX*):

An amendment is required. The following amendments are necessary:

(*Check all that apply.*)

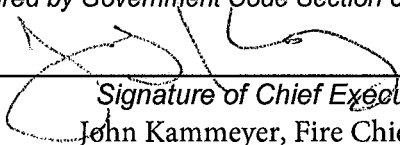
- Include new positions
- Revise disclosure categories
- Revise the titles of existing positions
- Delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions
- Other (*describe*) _____

The code is currently under review by the code reviewing body.

No amendment is required. (If your code is over five years old, amendments may be necessary.)

Verification (to be completed if no amendment is required)

This agency's code accurately designates all positions that make or participate in the making of governmental decisions. The disclosure assigned to those positions accurately requires that all investments, business positions, interests in real property, and sources of income that may foreseeably be affected materially by the decisions made by those holding designated positions are reported. The code includes all other provisions required by Government Code Section 87302.



Signature of Chief Executive Officer
John Kammeyer, Fire Chief

August 28, 2018

Date

All agencies must complete and return this notice regardless of how recently your code was approved or amended. Please return this notice no later than **September 1, 2018**, to:

Attention: *Juliet Fernandez*
Office of the Assessor-County Clerk-Recorder
555 County Center, Redwood City, CA 94063

PLEASE DO NOT RETURN THIS FORM TO THE FPPC.

2018 Local Agency Biennial Notice

Name of Agency: Coastside Fire Protection District
Mailing Address: 1191 Main Street, Half Moon Bay, CA 94019
Contact Person: Ian Larkin, Fire Chief Phone No. (650) 593-3117
Email: ian.larkin@fire.ca.gov Alternate Email: jbs@adcl.com (District Counsel)

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Signature of Chief Executive Officer

8/29/18

Date

Ian Larkin, Unit Chief, CalFIRE,

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2018 Local Agency Biennial Notice

Name of Agency: FIRE NET SIX
Mailing Address: 808 Portola Road Portola Valley, CA 94028
Contact Person: Chief Ghiorso Phone No. 650-851-1594
Email: dghiorso@woodsidefire.org Alternate Email: harolds@menlofire.org

Accurate disclosure is essential to monitor whether officials have conflicts of interest and to help ensure public trust in government. The biennial review examines current programs to ensure that the agency's code includes disclosure by those agency officials who make or participate in making governmental decisions.

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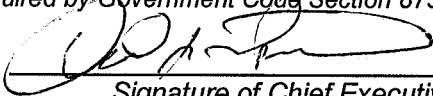
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Signature of Chief Executive Officer

8/15/2018

Date

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**Fire Net Six
List of Designated Filers
2018-19**

President

Harold Schapelhouman

Secretary

Daniel Ghorso

Treasurer

John Healy

Board Member

Ian Larkin

Stan Maupin

Daniel Ghorso

Harold Schapelhouman

Consultants

As needed

FIRE NET SIX JOINT POWERS AUTHORITY

NOTICE OF INTENTION TO AMEND A
CONFLICT OF INTEREST CODE

NOTICE IS HEREBY GIVEN that the Fire Net Six Joint Powers Authority intends to amend a conflict-of-interest code pursuant to Government Code Section 87300 and 87306. Pursuant to Government Code Section 87302, the code will designate employees and/or Board positions who must disclose certain investments, income, interests in real property and business positions, and who must disqualify themselves from making or participating in the making of governmental decisions affecting those interests.

A written comment period has been established commencing on August 16, 2018 and terminating on October 1, 2018. Any interested person may present written comments concerning the proposed code no later than October 1, 2018 to the Fire Net Six Joint Powers Authority, 808 Portola Road, Portola Valley, CA 94028. No public hearing on this matter will be held unless any interested person or his or her representative requests no later than 15 days prior to the close of the written comment period, a public hearing.

The Fire Net Six Joint Powers Authority has prepared a written explanation of the reasons for the designations and the disclosure responsibilities and has available all of the information upon which its proposal is based.

The only language revision proposed is shown with underscoring. It incorporates into the policy, references to the applicable Government Code Sections and California Code of Regulations citations. There are no other proposed changes.

Copies of the proposed code and all of the information upon which it is based may be obtained from the Fire Net Six Joint Powers Authority. Any inquiries concerning the proposed code should be directed to Chief Daniel Ghiorso, (650) 851-1594; dghiorso@woodsidefire.org.

NOTE: This notice should be filed with the Office of the Assessor-County Clerk-Recorder and served individually on agency employees and officers affected by this code 45 days prior to agency action.

RESOLUTION NO. 2018-01

AMENDING A CONFLICT OF INTEREST CODE

FIRE NET SIX JOINT POWERS AUTHORITY

WHEREAS, pursuant to previously adopted Resolution No. 1994-02, the Fire Net Six Joint Powers Authority adopted an amended Conflict of Interest Code as required by the Political Reform Act of 1974; and

WHEREAS, California Government Code Section 87306.5 requires that the Fire Net Six Joint Powers Authority review its Conflict of Interest Code every even-numbered year and revise it if necessary; and

WHEREAS, the Conflict of Interest Code has been reviewed and the changes shown as **bold** are proposed; and

WHEREAS, the Board of Directors has determined that the proposed changes are appropriate.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Fire Net Six Joint Powers Authority that the attached Conflict of Interest Code is hereby amended, in the form presented to the Board of Directors; and

BE IT FURTHER RESOLVED that if no comments are received pursuant to the 45-day written comment period, there will be no additional public hearing on the proposed code; and

BE IT FURTHER RESOLVED that the Secretary of the Board of Directors is directed to transmit a copy of the Amended Conflict of Interest Code ("Code") to the Board of Supervisors of the County of San Mateo for its review and approval; and

BE IT FURTHER RESOLVED that the effective date of the amended Code shall be upon

its approval by the Board of Supervisors and, unless and until the Code is so approved, that the Code previously adopted by the Fire Net Six Joint Powers Authority shall continue in full effect.

Regularly passed and adopted by the Board of Directors of the Fire Net Six Joint Powers Authority, State of California, on August 15, 2018, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Harold Schapelhouman
President, Board of Directors
Fire Net Six Joint Powers Authority

ATTEST:

Daniel Ghiorso
Secretary, Board of Directors
Fire Net Six Joint Powers Authority

CONFLICT OF INTEREST CODE
FIRE NET SIX JOINT POWERS AUTHORITY

The purposes of this Code are to provide for the disclosure of investments, real property, income and business positions of designated **Fire** Net Six Joint Powers Authority officials and employees that may be materially affected by their official actions and to provide for the disqualification of designated officials and employees from participation in **Fire** Net Six Joint Powers Authority decisions in which they may have a financial interest.

The Political Reform Act of 1974 (Government Code Sections 81000 et seq.) requires state and local governmental agencies to adopt and promulgate conflict of interest codes. **Fire** Net Six Joint Powers Authority adopted a Conflict of Interest Code as required by the Political Reform Act of 1974.

The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. Section 18730), which contains the terms of a standard conflict of interest code that can be incorporated by reference in an agency's code. After public notice and hearing it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations 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 Appendix designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of the **Fire** Net Six Joint Powers Authority.

Designated officials and employees shall file statements of economic interests with the **Fire** Net Six Joint Powers Authority. Upon receipt of the statements, the **Fire** Net Six Joint Powers Authority shall make and retain copies and forward the originals of these statements to the San Mateo County Board of Supervisors, in care of the San Mateo County Clerk.

APPENDIX

DESIGNATED OFFICIALS AND EMPLOYEES

<u>Designated Positions</u>	<u>Disclosure Category</u>
Member, Board of Directors	1, 2, 3, 4
<u>President</u>	<u>1, 2, 3, 4</u>
<u>Secretary</u>	<u>1, 2, 3, 4</u>
<u>Treasurer</u>	<u>1, 2, 3, 4</u>
Consultants/ <u>New Positions</u> *	1, 2, 3, 4

* The Board shall review the duties and authority of all consultants retained by the Net Six Joint Powers Authority. Those consultants who, within the meaning of 2 Cal. Code of Regulations 18701(a)(2), are required to file statements of economic interests, shall do so. During each calendar year, the Net Six Joint Powers Authority shall maintain a list of such consultants for public inspection in the same manner and location as this Conflict of Interest Code. **may determine in writing that a particular consultant or new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of disclosure requirements. The Board's determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code. (Government Code Section 81008.)**

Nothing herein excuses any consultant from any other provision of this Conflict of Interest Code, specifically those dealing with disqualification.

DISCLOSURE CATEGORIES

Category 1. All-Inclusive Reportable Investments

A designated employee in this category shall disclose all reportable investments (worth more than \$2,000):

- (a) Owned by the designated employee, his or her spouse or dependent child;
- (b) Owned by an agent on behalf of the designated employee;
- (c) Owned by any business entity controlled by the designated employee (i.e., any

business entity in which the designated employee, his or her agents, spouse and dependent children hold more than a 50% ownership interest);

- (d) Owned by a trust in which the designated employee has a substantial interest (i.e., a trust in which the designated employee, his or her spouse and dependent children have a present or future interest worth more than \$2,000);
 - (e) Representing the pro rata share (worth more than \$2,000) of the designated employee, his or her spouse and dependent children, of investments of any business entity or trust in which the designated employee, his or her spouse and dependent children own, directly, indirectly or beneficially, a 10% interest or greater.
-

“Investment” means any financial interest in or security issued by a **Fire** Net Six Joint Powers Authority-related business entity, including, but not limited to common stock, preferred stock, rights, warrants, options, debt instruments and any partnership or other ownership interest.

A business entity is “**Fire** Net Six Joint Powers Authority-related” if and only if the business entity or any parent, subsidiary or otherwise related business entity: i) has an interest in real property within the jurisdiction, ii) does business in the **Fire** Net Six Joint Powers Authority, or iii) did business or plans to do business in the **Fire** Net Six Joint Powers Authority at any time during the period commencing two years prior to and ending one year after the time the designated employee is required by this Code to file his or her next Statement of Economic Interests or to disqualify himself or herself with respect to a **Fire** Net Six Joint Powers Authority decision. (The term “parent, subsidiary, or otherwise related business entity” shall be construed as specifically defined by the Commission.)

No asset is deemed an “investment” unless its fair market value exceeds \$2,000.

The term “investment” does not include a time or demand deposit in a financial institution, shares in a credit union, any insurance policy, or any bond or other debt instrument issued by any government or government agency.

Category 2. All-Inclusive Reportable Interests in Real Property

A designated employee in this category shall disclose all interests (worth more than \$2,000) in real property located within the jurisdiction if the interests are:

- (a) Held or owned by the designated employee, his or her spouse and dependent child; or
- (b) The pro rata share (worth more than \$2,000) of interests in real property of any business entity or trust in which the designated employee or spouse owns, directly or indirectly or beneficially, a 10% interest or greater.

“Interest in real property” includes any leasehold, beneficial or ownership interest, or any option to acquire such an interest, in real property, but does not include the principal residence of the filer.

Real property shall be deemed to be “located within the jurisdiction” if the property or any part of it is located within or not more than two miles outside the boundaries of the **Fire** Net Six Joint Powers Authority or within two miles of any land owned or used by the **Fire** Net Six Joint Powers Authority.

Category 3. All-Inclusive Reportable Income

A designated employee in this category shall disclose all income of the designated employee for any **Fire** Net Six Joint Powers Authority-related source **pursuant to the aggregate amount and gift limit outlined in 2 California Code of Regulations Section 18730**, ~~which as of the date on which this code was adopted, aggregates \$500 or more or \$460 or more in the case of gifts during the reporting period.~~

- (a) “Income” means, except as provided in subsection b), income of any nature from any **Fire** Net Six Joint Powers Authority-related source, including but not limited to any salary, wage, advance, payment, honorarium, award, gift, including any gift of food or beverage, loan, forgiveness or payment of indebtedness, discount in the price of anything of value unless the discount is available to members of the general public without regard to official status, rebate, reimbursement for expenses, per diem, or contribution to an insurance or pension program paid by

any person other than an employer, and including any community property interest in income of a spouse from a **Fire** Net Six Joint Powers Authority-related source. Income of an individual also includes a pro rata share of any income of any **Fire** Net Six Joint Powers Authority-related business entity or trust in which the individual or spouse owns, directly, indirectly or beneficially, a ten percent interest or greater.

A source, business entity or trust is "**Fire** Net Six Joint Powers Authority-related" if and only if he, she or it: (I) resides in the boundaries of the **Fire** Net Six Joint Powers Authority, (ii) has an interest in real property within the boundaries of the **Fire** Net Six Joint Powers Authority, (iii) does business in the **Fire** Net Six Joint Powers Authority at any time during the period commencing two years prior to and ending one year after his or her next Statement of Economic Interests or to disqualify himself or herself with respect to a **Fire** Net Six Joint Powers Authority decision.

(b) "Income" does not include:

(1) Campaign contributions required to be reported under Chapter 4 of the Act;

(2) Salary and reimbursement for expenses or per diem received from a state or local government agency and reimbursement for travel expenses and per diem received from a bona fide educational, academic or charitable organization;

(3) Gifts of informational material, such as books, pamphlets, reports, calendars or periodicals;

(4) Gifts which are not used and which, within thirty days after receipt, are returned to the donor or delivered to a charitable organization without being claimed as a charitable contribution for tax purposes;

(5) Gifts from an individual's spouse, child, parent, grandparent, grandchild, brother, sister, parent-in-law, brother-in-law, sister-in-law, aunt, uncle, or first cousin or the spouse of any such person; provided that a gift from any such person shall be considered income if the donor is acting as an agent or intermediary for any person not covered by this paragraph;

(6) Gifts of hospitality involving food, beverages, or lodging provided to the designated employee, if such hospitality has been reciprocated within the filing period. "Reciprocity" as used in this subsection includes the providing by the designated employee to the host of any consideration, including entertainment or household gift of a reasonable similar benefit or value;

(7) Any devise or inheritance;

(8) Interest, dividends or premiums on a time or demand deposit in a financial institution, shares in a credit union or any insurance policy, payments received under any insurance policy, or any bond or other debt instrument issued by any government or government agency;

(9) Dividends, interest or any other return on a security which is registered with the Securities and Exchange Commission of the United States Government; and

(10) Loans by a commercial lending institution in the regular course of business.

-
- (c) “Honorarium” means a payment for speaking at any event, participating in a panel or seminar or engaging in any similar activity. For purposes of this subsection, free admission, food, beverages and similar nominal benefits provided to a filer at an event at which he or she speaks, participates in a panel or seminar, or performs a similar service, and reimbursement or advance for actual intra-state travel and for necessary accommodations provided directly in connection with the event are not payment and need not be reported by the designated employee.

An honorarium must be reported as a gift unless it is clear from all of the surrounding circumstances that the services provided represented equal or greater value than the payment received. ~~It-if~~ **If it** is clear ~~from~~ **from** the surrounding circumstances that the services provided were of equal or greater value than the payment received, the honorarium is income, not a gift. When the designated employee claims that the honorarium is not a gift, he shall have the burden of proving that the consideration is of equal or greater value unless the designated employee is a defendant in a criminal action.

A prize or an award shall be disclosed as a gift unless the prize or award is received on the basis of a bona fide competition not related to the designated employee’s official status. Prizes or awards which are not disclosed as gifts shall be disclosed as income.

Category 4. Less-Inclusive Reportable Investments

A designated employee in this category shall disclose those, and only those, Category 1 reportable investments which pertain to a business entity, a business activity of which is that of:

- (a) Providing within the last two (2) years, or foreseeable in the future, services, supplies, materials, machinery or equipment to the **Fire** Net Six Joint Powers Authority.
- (b) Conducting a business in the boundaries of the **Fire** Net Six Joint Powers Authority which requires a business license therefor pursuant to ordinances of the **Fire** Net Six Joint Powers Authority.

- (c) Sale, purchase, exchange, lease or rental, or financing, for its own account or as broker, of real property or the development, syndication or subdivision of real property or construction thereon of buildings or structures.

Category 5. Less-Inclusive Reportable Interests in Real Property

A designated employee in this category shall disclose those, and only those, Category 2 reportable interests in real property where the property or any part of it is located within or not more than 500 feet outside the boundaries of the **Fire** Net Six Joint Powers Authority.

Category 6. Less-Inclusive Types of Reportable Income

A designated employee in this category shall disclose those, and only those types of Category 3 reportable income which are derived from a source, an activity of which is that of:

- (a) Providing within the last two (2) years, or foreseeable in the future, services, supplies, materials, machinery or equipment to the **Fire** Net Six Joint Powers Authority.
- (b) Conducting a business in the boundaries of the **Fire** Net Six Joint Powers Authority which requires a business license therefor pursuant to ordinances of the **Fire** Net Six Joint Powers Authority.
- (c) Sale, purchase, exchange, lease or rental, or financing, for its own account or as broker, of real property or the development, syndication, or subdivision, of real property or construction thereon of buildings or structures.

2018 Local Agency Biennial Notice

Name of Agency: SILICON VALLEY CLEAN WATER

Mailing Address: 1400 RADIO ROAD, REDWOOD CITY, CA 94065

Contact Person: TERESA HERRERA Phone No. 650.591.7121

Email: _____ Alternate Email: _____

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Signature of Chief Executive Officer

Date

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Office of the Assessor-County Clerk-Recorder
555 County Center, Redwood City, CA 94063*

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RESOLUTION NO. SVCW 18 – 02

RESOLUTION AMENDING AND APPROVING THE 2018 CONFLICT OF INTEREST CODE FOR SILICON VALLEY CLEAN WATER

WHEREAS, pursuant to Resolution No. 80-13 adopted May 6, 1980, this Commission adopted by reference a Conflict of Interest Code for the Silicon Valley Clean Water ("Authority") comprised of the provisions of California Code of Regulations, Title 2, Section 18730; and

WHEREAS, the Code has been amended from time to time to conform to the requirements of law and to provide revisions to the list of Designated Employees subject thereto; and

WHEREAS, changed circumstances have occurred necessitating further amendment to the Code, including the addition of new positions and/or changed titles of positions subject to the reporting requirements thereof.

NOW, THEREFORE, BE IT RESOLVED BY THE COMMISSION OF SILICON VALLEY CLEAN WATER AS FOLLOWS:

1. The Conflict of Interest Code of the Silicon Valley Clean Water is hereby amended as set forth in Exhibits "A" and "B" hereof, attached hereto and incorporated herein.

2. The Secretary of the Authority is hereby authorized and directed to transmit a copy of this resolution to the Assessor-County Clerk-Recorder, County of San Mateo, acting for and on behalf of the Authority's Code Reviewing Body.

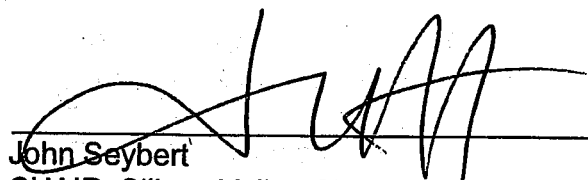
Regularly passed and adopted by the Commission of Silicon Valley Clean Water at a Special meeting thereof held on January 18, 2018 by the following vote:

AYES: John Seybert, City of Redwood City; Warren Lieberman, City of Belmont; Robert Grassilli, City of San Carlos

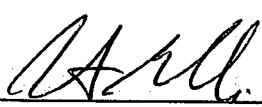
NOES, and against the passage and adoption of the foregoing resolution: None

ABSENT: George Otte, West Bay Sanitary District

(continued on next page)



John Seybert
CHAIR, Silicon Valley Clean Water Commission

Attest: 

Robert Grassilli
SECRETARY, Silicon Valley Clean Water Commission

EXHIBIT A

2018 CONFLICT OF INTEREST UPDATE

**SILICON VALLEY CLEAN WATER
DESIGNATED OFFICIALS AND EMPLOYEES**

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Commission, Commission of SVCW	All Categories
Secretary, SVCW	All Categories
Manager	All Categories
Assistant Manager/Chief Engineering Officer	All Categories
Chief Operating Officer	All Categories
Chief Financial Officer/Administration Manager	All Categories
Executive Assistant to the Manager*	3, 4
Health & Safety Director	3, 4
Information Systems Director	3, 4
Engineering Director	3, 4
Environmental Services Director	3, 4
Operations Director	3, 4
Maintenance Director	3, 4
Laboratory Director	3, 4
Human Resources Director	3, 4
Attorney	All Categories
Consultant**	All Categories

*New Title/Position

**Consultant is defined in Regulation 18700(a) (2) in 2 California Code of Regulations

The (executive director or executive officer) may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of the disclosure requirements (Exhibit B). The (executive director or executive officer's) determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code.

EXHIBIT B
2018 CONFLICT OF INTEREST UPDATE
SILICON VALLEY CLEAN WATER

DESIGNATED CATEGORIES

CATEGORY 1. A designated employee assigned to Category 1 is required to disclose investments which may foreseeably be materially affected by any decision made or participated in by the designated employee.

CATEGORY 2. A designated employee assigned to Category 2 is required to disclose interests in real property which may be materially affected by any decision made or participate in by the designated employee.

CATEGORY 3. A designated employee assigned to Category 3 is required to disclose income which may be materially affected by any decision made or participated in by the designated employee.

CATEGORY 4. A designated employee assigned to Category 4 is required to disclose any business entity in which the designated employee is a director, officer, partner, trustee, or holds any position of management which may be materially affected by any decision made or participated in by the designated employee.

2018 Local Agency Biennial Notice

Name of Agency: South Bayside Waste Management Authority
Mailing Address: 1001 Laurel Street, Suite A, San Carlos, CA 94070
Contact Person: Jean Savaree, Dept. Gen. Counsel Phone No. (650) 593-3117
Email: jbs@adcl.com Alternate Email: mcardinale@adcl.com

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Signature of Chief Executive Officer

Joe La Mariana, Executive Director

August 28, 2018

Date

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Office of the Assessor-County Clerk-Recorder
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2018 Local Agency Biennial Notice

Name of Agency: San Mateo County Transit District
Mailing Address: 1250 San Carlos Avenue, San Carlos, CA 94070
Contact Person: Cindy Gumpal Phone No. 650-508-6279
Email: gumpalc@samtrans.com Alternate Email: _____

Accurate disclosure is essential to monitor whether officials have conflicts of interest and to help ensure public trust in government. The biennial review examines current programs to ensure that the agency's code includes disclosure by those agency officials who make or participate in making governmental decisions.

This agency has reviewed its conflict of interest code and has determined that (*check one BOX*):

An amendment is required. The following amendments are necessary:

(*Check all that apply.*)

- Include new positions
- Revise disclosure categories
- Revise the titles of existing positions
- Delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions
- Other (*describe*) _____

The code is currently under review by the code reviewing body.

No amendment is required. (If your code is over five years old, amendments may be necessary.)

Verification (to be completed if no amendment is required)

This agency's code accurately designates all positions that make or participate in the making of governmental decisions. The disclosure assigned to those positions accurately requires that all investments, business positions, interests in real property, and sources of income that may foreseeably be affected materially by the decisions made by those holding designated positions are reported. The code includes all other provisions required by Government Code Section 87302.

Signature of Chief Executive Officer

9-11-18

Date

All agencies must complete and return this notice regardless of how recently your code was approved or amended. Please return this notice no later than **October 1, 2018**, or by the date specified by your agency, if earlier, to:

(PLACE REQUEST HERE)
PLEASE San Mateo County
TRANSIT DISTRICT
1250 San Carlos Ave. - P.O. Box 3006
San Carlos, CA 94070-1306 **PLEASE RETURN TO FPPC.**