

Filing with a Digital Signature

February 2022

Methods of Filing

Under the Act and Commission regulations, many forms—including Form 700s—may be filed via paper with a handwritten signature or with a "secure electronic signature," which may be submitted in two ways. The first form of a "secure electronic signature" is an electronic signature included in an electronic filing system. The second form of a "secure electronic signature" is a "digital signature," which may be used to sign documents electronically, if permitted by the filing officer. The use of "digital signatures" in FPPC forms is the subject of this guide.

What is a "Digital Signature?"

In short, a digital signature is a type of certificate-based electronic signature that offers increased security to ensure the identity of the signer and prevent the alteration of documents after signing.

Digital Signature Services

Numerous companies offer digital signature services, but this guide focuses on one common program that may be used for digital signatures at no cost—Adobe Acrobat Reader DC ("Adobe Reader" or "Adobe").

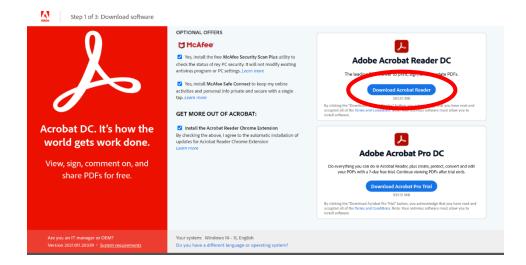
Adobe Reader allows officials to create a Digital ID to digitally sign documents, which may then be verified as valid by filing officials.

The steps below describe the signing and validation process for "self-signed" Digital IDs—that is, a Digital ID created by the signer, rather than issued by a Certificate Authority ("CA"). As explained in detail below, self-signed Digital IDs must be manually verified before they may be considered valid. In contrast, Digital IDs issued by a CA are automatically validated by the CA, which operates similarly to a notary public. An agency may use a CA for digital signature services, but there are generally costs associated with such services, just as there are with an electronic filing system.

Steps for the Filer

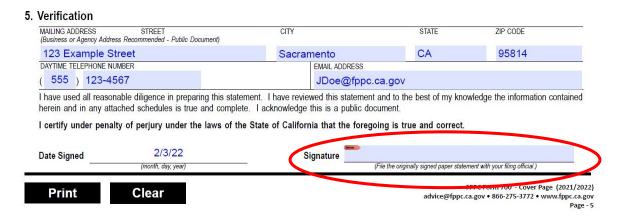
Step 1: Download and install Adobe Reader

If you do not already have an Adobe product capable of digitally signing a document, Adobe Reader can be downloaded at https://get.adobe.com/reader/.



Step 2: Fill out every applicable form field, other than the filer signature field, unless a field is specifically reserved for use by the filing official.

Step 3: Review your document for completeness and accuracy, then click the filer signature field.



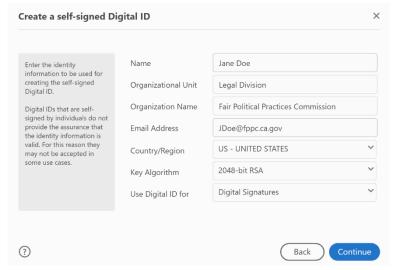
NOTE: Once the form has been digitally signed, the form fields cannot be altered unless the digital signature is removed. For this reason, it is important to review the document for completeness and accuracy.

Step 4: Create or Choose a Digital ID

After clicking the filer signature field, you will be prompted with a text box that reads, "Sign with a Digital ID." If you do not already have a Digital ID, click "Configure New Digital ID," followed by "Create a new Digital ID," then "Save to File."

Fill in the relevant information, including your name, agency email address, and organization name and unit.

Keep "Country/Region," "Key Algorithm," and "Use Digital ID for" on the default selections of "US – UNITED STATES," "2048-bit RSA," and "Digital Signatures," respectively.



Click "Continue" and you will be asked to create a password for your Digital ID. Create a password, then select where to save your Digital ID. You will need to access this file to digitally sign documents, so the file should be saved in a location that is private and secure.

Step 5: Sign with Your Digital ID

You will be returned to the "Sign with a Digital ID" screen. Choose your new Digital ID and click "Continue." On the next page, enter the password for your Digital ID, click "Sign," and choose where to save your signed document.

NOTE: It is recommended you choose a new file name so that your signed version does not overwrite the unsigned version of the document.



Step 6: Review and Submit Your Document

Review the document again, then send it to your filing official via your agency email address.

NOTE: If, after signing, you realize you need to amend some aspect of your form, right click your signature and click "Clear Signature."

Steps for the Filing Official

Step 1: Review the Document for Digital Signature Validity

A blue banner at the top of the document should state whether the document has been signed with valid signatures. A valid checkmark is represented by a cursive signature icon with a green checkmark.



Signed and all signatures are valid. Please fill out the following form.

Step 2: Confirm the Authenticity of the Filer's Signature

Upon receiving a document signed with a self-signed Digital ID for the first time, the document will not indicate that the signature is valid. Rather, an icon including a yellow triangle with an exclamation point will display, indicating a problematic signature.



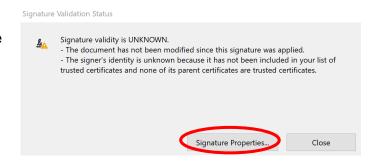
At least one signature has problems. Please fill out the following form.

In this instance, you should reach out to the filer, generally via phone or email, to confirm the purported filer did, in fact, send the digitally signed document.

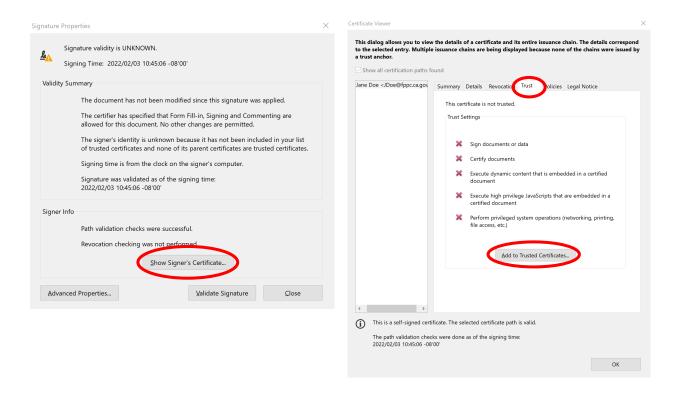
NOTE: If the file received is sent from the filer's agency email address, you will not need to take further action to confirm the identity of the filer.

Step 3: Validate the Filer's Signature in Adobe

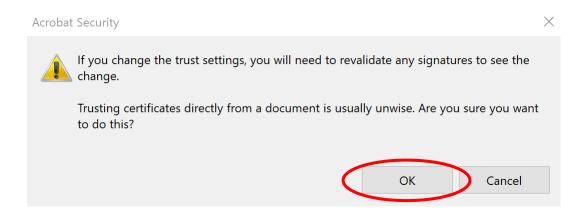
Once you have confirmed the identity of the filer and their use of the Digital ID, click on the signature in the file, followed by "Signature Properties."



Click on "Show Signer's Certificate," the "Trust" tab, then "Add to Trusted Certificates."

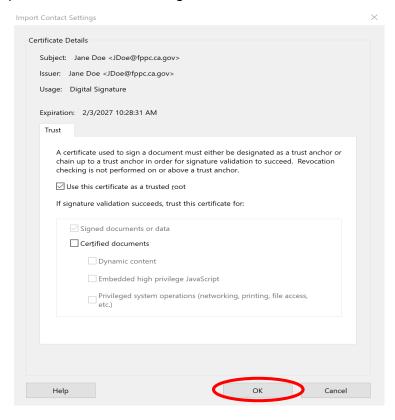


Adobe will display a text box stating, "If you change the trust settings, you will need to revalidate any signatures to see the change. Trusting certificates directly from a document is usually unwise. Are you sure you want to do this?" Having confirmed the authenticity of the filer's signature in Step 2, click "OK."



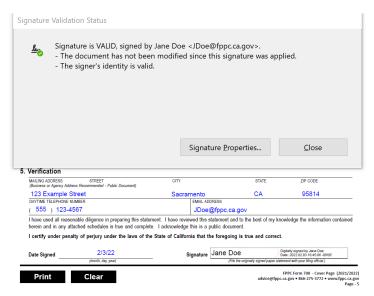
Adobe will display a page with a pre-checked box reading, "Use this certificate as a

trusted root," above another pre-checked box reading, "Signed documents or data." Leave these boxes checked and the other boxes unchecked, then click "OK."



Step 6: Confirm the signature has been validated

Click the signature again and it should now display as valid.



Step 7: Add the Date Received

Note the date the form was received in the field reserved for the filing official.



STATEMENT OF ECONOMIC INTERESTS Date Initial Filing Received **COVER PAGE** A PUBLIC DOCUMENT 2/3/22

Upon reopening the file, a banner will indicate that the filer's signature is valid, with a subsequent change to the form—that is, the addition of the filing date.



Signed and all signatures are valid, but with unsigned changes after the last signature. Please fill out the following form.

Step 8: Save

Save the form. It is also recommended that you save an electronic copy of the email in which the form was sent.