PATRICK OGAWA
ACTING EXECUTIVE OFFICER

# COUNTY OF LOS ANGELES
# BOARD OF SUPERVISORS

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**ADOPTED**
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

12 January 6, 2015

PATRICK OGAWA
ACTING EXECUTIVE OFFICER

January 06, 2015

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

**CONFLICT OF INTEREST AND DISCLOSURE CODE**
**(ALL DISTRICTS) (3-VOTES)**

## SUBJECT

Approval of the Conflict of Interest and Disclosure Codes.

## IT IS RECOMMENDED THAT THE BOARD:

Approve the Conflict of Interest and Disclosure Codes for the Montebello Unified School District; Office of County Counsel; Office of Public Defender; and Redondo Beach Unified School District to be effective the day following your Board's approval.

## PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

In accordance with the Political Reform Act of 1974, the Board of Supervisors is the code reviewing body for Los Angeles County.

Pursuant to Government Code Section 87300, every local government agency must adopt and promulgate a Conflict of Interest and Disclosure Code. The Board of Supervisors must approve the code before it can take effect.

Pursuant to Government Code Section 87306, agencies are required to amend their Conflict of Interest Codes when necessitated by changed circumstances.

## Implementation of Strategic Plan Goals

Approval of the attached codes broadly supports the County Strategic Goal of Operational Effectiveness/Fiscal Sustainability.

The proposed Conflict of Interest and Disclosure Codes have been thoroughly reviewed and approved by the code review staff in accordance with the procedures established by your Board.

## FISCAL IMPACT/FINANCING

Local governmental agencies must have a Conflict of Interest and Disclosure Code in which individuals in designated positions are required to disclose financial interests at a level appropriate to their decision-making authority.

Adoption of a Conflict of Interest and Disclosure Code deters potential conflicts of interest, thereby averting misuse of public funds.

The recommended action has no effect on budget revenues and expenditures.

## FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Pursuant to Government Code Section 87300, the code review staff recommends that your Board approve the Conflict of Interest and Disclosure Codes for the agencies listed below.

SUBSTANTIVE CHANGES:

(Montebello Unified School District)

- The Incorporation page has been modified to reflect those positions which will file directly with the Executive Office.

- Exhibit “A” is modified with the definitions for income to include gifts, loans and travel payments.

- Adds a new disclosure category to Exhibit “A”.

- Renumbers an existing category.

- Exhibit “B” is modified with a clarifying footnote for Consultants and New Positions.

- Exhibit “B” is modified with the deletion of the section “Public Officials Who Manage Public Investments under Government Code 87200, et seq.” The position under this heading was converted to a “Designated Position” filer within Exhibit “B”, with the appropriate disclosure category.

- Changes the titles of three (3) positions.

- Expands the disclosure of two (2) positions.

- Adds Controller; Superintendent of Education; Deputy Superintendent; Associate Superintendent; Personnel Commission Members; Citizens’ Bond Oversight Committee Members; and Consultants/New Positions to the code.

(Office of County Counsel)

- Exhibit “A” is modified with the definitions for income to include gifts, loans and travel payments.
- Exhibit “B” is modified with a clarifying footnote for Consultants and New Positions.
- Adds Departmental Information Security Officer I to the code.

(Office of Public Defender)

- Adds Departmental Information Security Officer I to the code.

(Redondo Beach Unified School District)

- Deletes Assistant Superintendent Student Services from the code due to reorganization.
- Changes the titles of two (2) positions.
- Adds Bond Committee Members to the code.

**IMPACT ON CURRENT SERVICES (OR PROJECTS)**

Approving the attached Conflict of Interest and Disclosure Codes for these agencies will further the purposes of the Political Reform Act of 1974 by requiring the individuals designated in each agency’s code to disclose appropriate economic interests.

Respectfully submitted,

PATRICK OGAWA
Acting Executive Officer, Board of Supervisors

PO: kw

Enclosures

c: Interim Chief Executive Officer
County Counsel

Conflict of Interest Code
of the

# MONTEBELLO UNIFIED SCHOOL DISTRICT

## Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 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 (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest 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 into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

## Place of Filing of Statements of Economic Interests

All officials and employees required to submit a statement of economic interests shall file their statements with the agency head; or his or her designee. The agency shall make and retain a copy of all statements filed by its Board Members, Superintendent of Schools, and the Superintendent of Education and forward the originals of such statements to the Executive Office of the Board of Supervisors of Los Angeles County.

The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

## MONTEBELLO UNIFIED SCHOOL DISTRICT

## EXHIBIT "A"

### CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be 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 jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

### CATEGORY 2

Persons in this category shall disclose all investments and business positions.

### CATEGORY 3

Persons in this category shall disclose all income (including gifts, loans and travel payments) and business positions.

### CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts, loans and travel payments) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclosure category.

### CATEGORY 5

Persons in this category shall disclose all income (including gifts, loans and travel payments) from, investments in, and business positions with any district employee, any agent or employee association representing any such employee, and business positions with, investments in or income (including gifts, loans and travel payments) from any entity owned or controlled by such employee or any such employee's spouse or other financial dependent.

**MONTEBELLO UNIFIED SCHOOL DISTRICT**

**EXHIBIT "A" (Cont'd)**

**CATEGORY 6**

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information, advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the Superintendent of Schools or his or her designee of the agency. (See footnote for clarification.)

**MONTEBELLO UNIFIED SCHOOL DISTRICT**
**EXHIBIT "B"**

| Designated Positions | Disclosure Categories |
|---|---|
| Member, Board of Education | 1, 2, 3 |
| Superintendent of Schools | 1, 2, 3 |
| Superintendent of Education | 1, 2, 3 |
| Deputy Superintendent | 1, 2, 3 |
| Associate Superintendent | 1, 2, 3 |
| Assistant Superintendent, Facilities, Maintenance and Operations | 1, 2, 3 |
| Controller | 1, 2, 3 |
| Assistant Superintendent, Business Services | 1, 2, 3 |
| Director of Facilities Development | 1, 2, 3 |
| Director of Procurement and Logistics | 1, 2, 3 |
| Personnel Commission Members | 5 |
| Assistant Superintendent, Human Resources | 2, 3 |
| Assistant Superintendent, Instructional Services | 4 |
| Assistant Superintendent, Pupil and Community Services | 4 |
| Director, Curriculum & Instruction | 4 |
| Director of Federal & State Projects | 4 |
| Director of Information Systems | 4 |
| Director of Maintenance and Operations | 2, 3 |
| Director of Nutrition Services | 4 |

**MONTEBELLO UNIFIED SCHOOL DISTRICT**
**EXHIBIT "B" (Cont'd)**

| Designated Positions | Disclosure Categories |
|---|---|
| Director of Risk Management | 4 |
| Director of Transportation | 1, 4 |
| Sourcing & Contracting Manager | 1, 4 |
| Senior Buyer | 4 |
| Citizens' Bond Oversight Committee Members | 1, 4 |
| Consultants/New Positions* | 6 |

* Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitations:

The Superintendent of Schools or his or her designee 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 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 Superintendent of Schools or his or her designee'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. (Gov. Code Section 81008.)

**EFFECTIVE:**

Conflict of Interest Code
of the

**COUNTY COUNSEL**

## Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 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 (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest 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 into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

## Place of Filing of Statements of Economic Interests

All officials and employees required to submit a statement of economic interests shall file their statements with the agency head; or his or her designee. The agency shall make and retain a copy of all statements filed by its Department Head and forward the originals of such statement to the Executive Office of the Board of Supervisors of Los Angeles County.

The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

## COUNTY COUNSEL

## EXHIBIT "A"

### CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be 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 jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

### CATEGORY 2

Persons in this category shall disclose all investments and business positions.

### CATEGORY 3

Persons in this category shall disclose all income (including gifts, loans and travel payments) and business positions.

### CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts, loans and travel payments) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclosure category.

### CATEGORY 5

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information, advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the executive officer (or head) of the agency. (See footnote for clarification)

## COUNTY COUNSEL

## EXHIBIT "B"

| Designated Position | Disclosure Categories |
|---|---|
| Chief Deputy County Counsel | 1, 2, 3 |
| Litigation Cost Manager, County Counsel | 1, 2, 3 |
| Senior Assistant County Counsel | 1, 2, 3 |
| Assistant County Counsel | 1, 2, 3 |
| Senior Deputy County Counsel | 1, 2, 3 |
| Deputy County Counsel | 1, 2, 3 |
| Senior Associate County Counsel | 1, 2, 3 |
| Associate County Counsel | 1, 2, 3 |
| Administrative Deputy II | 1, 2, 3 |
| Head, Administrative Systems, County Counsel | 4 |
| Departmental Finance Manager II | 4 |
| Departmental Human Resources Manager II | 2, 3 |
| Departmental Information Security Officer I | 4 |
| Information Technology Specialist II | 4 |
| Law Librarian, County Counsel | 4 |
| Management Specialist, County Counsel | 4 |
| Consultants/New Positions* | 5 |

**COUNTY COUNSEL**

**EXHIBIT "B"**

*Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitations:

The Executive Officer (or agency head) or his or her designee 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 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 Executive Officer (or agency head) or his or her designee'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. (Gov. Code Section 81008.)

**NOTE:** The County Counsel is required to file pursuant to Government Code Section 87200 et seq., and is, therefore, not included in the list of designated positions for this department.

**EFFECTIVE:**

Conflict of Interest Code
of the

# OFFICE OF PUBLIC DEFENDER

## Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 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 (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest 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 into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

## Place of Filing of Statements of Economic Interests

All officials and employees required to submit a statement of economic interests shall file their statements with the agency head, or his or her designee. The agency shall make and retain a copy of all statements filed by its Public Defender and forward the originals of such statement to the Executive Office of the Board of Supervisors of Los Angeles County.

The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

## OFFICE OF PUBLIC DEFENDER

## EXHIBIT "A"

### CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be 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 jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

### CATEGORY 2

Persons in this category shall disclose all investments and business positions.

### CATEGORY 3

Persons in this category shall disclose all income (including loans, gifts, and travel payments) and business positions.

### CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including loans, gifts, and travel payments) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclosure category.

### CATEGORY 5

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information, advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the executive officer (or head) of the agency. (See footnote for additional clarification.)

## OFFICE OF PUBLIC DEFENDER

## EXHIBIT "B"

| Designated Positions | Disclosure Categories |
|---|---|
| Public Defender | 1, 2, 3 |
| Chief Deputy Public Defender | 1, 2, 3 |
| Assistant Public Defender | 1, 2, 3 |
| Administrative Deputy | 1, 2, 3 |
| Division Chief | 2, 3 |
| Departmental Finance Manager II | 4 |
| Departmental Information Systems Manager | 4 |
| Departmental Information Security Officer I | 4 |
| Consultants/ New Positions* | 5 |

*Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitations:

The Public Defender or his or her designee 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 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 Public Defender or his or her designee'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. (Gov. Code Section 81008.)

**EFFECTIVE:**

Conflict of Interest Code
of the

# REDONDO BEACH UNIFIED SCHOOL DISTRICT

## Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 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 (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest 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 into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

## Place of Filing of Statements of Economic Interests

All officials and employees required to submit a statement of economic interests shall file their statements with the agency head; or his or her designee. The agency shall make and retain a copy of all statements filed by its Members of the Board of Education and the Superintendent, and forward the originals of such statements to the Executive Office of the Board of Supervisors of Los Angeles County.

The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

# REDONDO BEACH UNIFIED SCHOOL DISTRICT

## EXHIBIT "A"

### CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be 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 jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

### CATEGORY 2

Persons in this category shall disclose all investments and business positions.

### CATEGORY 3

Persons in this category shall disclose all income (including gifts, loans and travel payments) and business positions.

### CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts, loans and travel payments) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclosure category.

### CATEGORY 5

Persons in this category shall disclose all income (including gifts, loans and travel payments) from any Redondo Beach Unified School District employee, any representative or association of such employee; and business positions or income from any entity owned or controlled by such employee's spouse or other financial dependent.

## REDONDO BEACH UNIFIED SCHOOL DISTRICT

## EXHIBIT "A" (Cont'd)

### CATEGORY 6

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information, advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the executive officer (or head) of the agency. (See footnote for clarification.)

## REDONDO BEACH UNIFIED SCHOOL DISTRICT

## EXHIBIT "B"

| Designated Positions | Disclosure Categories |
|---|---|
| Members of the Board of Education | 1, 2, 3 |
| Superintendent | 1, 2, 3 |
| Asst. Superintendent, Human Resources | 1, 2, 3 |
| Assistant Superintendent Administrative Services | 1, 2, 3 |
| Director Facilities Management & Construction | 1, 2, 3 |
| Deputy Superintendent Educational Services | 2, 3 |
| Executive Director Special Education | 4, 5 |
| Bond Committee Members | 1, 4 |
| Director Child Nutrition & Purchasing | 4 |
| Assistant Director Maintenance & Operations | 4 |
| Director Adult School | 4 |
| Chief Technology Officer | 4 |
| Consultants/ New Positions* | 6 |

**REDONDO BEACH UNIFIED SCHOOL DISTRICT**

**EXHIBIT "B"**

*Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitations:

The Superintendent or his or her designee 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 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 Superintendent or his or her designee'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. (Gov. Code Section 81008.)

**EFFECTIVE:**