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WHEREAS, the Political Reform Act (Government Code §§ 81000, et seq.), requires every state and local government agency to adopt and promulgate a Conflict of Interest Code; and

WHEREAS, it has been determined that the City's current Conflict of Interest Code, as adopted by Resolution No. 2006-R042, needs to be amended due to positions that have been created or eliminated, or a change to a position title; and

WHEREAS, the City Council has determined that Appendix "A," attached hereto and incorporated herein, accurately sets forth those designated officials and employees, and their respective categories of reportable financial interests.

1           NOW, THEREFORE, the City Council of the City of Culver City, California,  
2 DOES HEREBY RESOLVE as follows:

3           1.     The terms of 2 California Code of Regulations § 18730, and any  
4 amendments thereto, which have been duly adopted by the Fair Political Practices  
5 Commission (FPPC), are hereby incorporated by reference and, together with the attached  
6 Appendix "A," which designates City officials and employees and establishes respective  
7 financial disclosure categories, shall constitute the City of Culver City Conflict of Interest  
8 Code.  
9

10           2.     Future amendments to the terms of 2 California Code of Regulations  
11 § 18730, which are duly adopted by the FPPC, shall become part of the Culver City Conflict  
12 of Interest Code upon the expiration of forty-five (45) days after receipt by the City Council,  
13 unless the City Council, by Resolution, decides not to adopt such amendments in whole or in  
14 part. The City Council hereby reserves the right not to adopt any provisions not within the  
15 jurisdiction of the FPPC pursuant to Government Code § 81000, et seq.  
16

17           3.     Designated employees and elected and appointed officials identified in  
18 Appendix "A" shall file Statements of Economic Interests (Form 700 Statements) with the City  
19 Clerk, to whom the City Council hereby delegates the authority to carry out the duties of filing  
20 officer. The Form 700 Statements of designated employees shall be retained as official  
21 records by the City Clerk and shall be made available for public inspection and reproduction,  
22 in accordance with Government Code § 81008.  
23

24           4.     Pursuant to Government Code §§ 87200 et seq., upon receipt of Form  
25 700 Statements completed by City Council Members, Planning Commissioners, the City  
26 Manager, the City Attorney and the Chief Financial Officer/City Treasurer, the City Clerk shall  
27 make and retain a copy and forward the original of these Form 700 Statements to the FPPC.  
28

5. Resolution No. 2006R-042 is hereby rescinded.

APPROVED AND ADOPTED this 27<sup>th</sup> day of March, 2017.

JIM B. CLARKE, MAYOR  
City of Culver City, California

ATTEST:

APPROVED AS TO FORM:

JEREMY GREEN,  
City Clerk

CAROL A. SCHWAB,  
City Attorney

A16-00865

CONFLICT OF INTEREST CODE

APPENDIX "A"

Designated Position

Disclosure

Administration

City Manager

\*

Assistant City Manager

4

Assistant to the City Manager

4

Administrative Services/HR Department

Director of Administrative Services

4

Human Resources Analyst

4

Claims and Safety Coordinator

4

Cultural Affairs Coordinator

4

City Clerk

1, 2, 3, 4, 5

Deputy City Clerk

1, 2, 3, 4, 5

City Attorney

City Attorney

\*

Assistant City Attorney

1, 2, 3, 4, 5

Assistant City Prosecutor

1, 2, 3, 4, 5

Sr. Deputy City Attorney

1, 2, 3, 4, 5

Deputy City Attorney I & II

1, 2, 3, 4, 5

Legal Operations Manager

1, 2, 3, 4, 5

City Council

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1		
2	<u>Civil Service Commission</u>	1, 2, 3, 4, 5
3		
4	<u>Community Development Department</u>	
5	Community Development Director	1, 2, 3, 4, 5
6	Deputy Community Development Director/Planning Manager	1, 2, 3, 4, 5
7	Deputy Community Development Director /Economic Dev. Mgr.	1, 2, 3, 4, 5
8	Advance Planning Manager	1, 2, 3, 4, 5
9	Economic Development Project Manager	1, 2, 3, 4, 5
10	Senior Planner	1, 2, 3, 4, 5
11	Housing Programs Administrator	1, 2, 3, 4, 5
12	Housing Programs Supervisor	2, 3, 4, 5
13	Housing Specialist	1, 4
14	Structural Rehabilitation Specialist	1, 4
15	Building Official	1, 2, 3
16	Senior Building & Safety Inspector	1, 2, 3
17	Enforcement Services Manager	1, 2, 3
18	Senior Management Analyst	4
19		
20	<u>Consultants/Contract Employees</u> (All Departments and Divisions)	**
21		
22	<u>Cultural Affairs Commissioners</u>	1, 2, 3, 4, 5, 6
23		
24	<u>Fire Department</u>	
25	Fire Chief	1, 2, 3, 5
26	Assistant Fire Chief	1, 2, 3, 5
27	Battalion Chief (including Fire Marshal)	1, 2, 3, 5
28		

1	Fire Captain (including Training Officer and EMS Coordinator)	1, 2, 3
2	Emergency Preparedness Coordinator	4
3		
4	<u>Finance Advisory Committee</u>	1, 2, 3, 4, 5
5		
6	<u>Finance Department</u>	
7	Chief Financial Officer/City Treasurer	*
8	Assistant Chief Financial Officer	1, 2, 3, 4, 5
9	Accounting Operations Manager	1, 2, 3, 4, 5
10	Budget & Financial Operations Manager	1, 2, 3, 4, 5
11	Procurement & Financial Services Manager	1, 2, 3, 4, 5
12	Revenue Operations Manager	1, 2, 3, 4, 5
13	Warehouse Supervisor	2, 3, 4, 5
14	Budget Management Analyst	4
15	Sr. Enterprise Business Systems Analyst	4
16		
17	<u>Information Technology Department</u>	
18	Chief Information Officer	4
19	Technical Services Manager	4
20	Systems Development Manager	4
21	Systems Support Manager	4
22		
23	<u>Parks, Recreation and Community Services Commission</u>	1, 2, 3, 4, 5
24		
25	<u>Parks, Recreation and Community Services Department</u>	
26	Parks, Recreation and Community Services Director	1, 2, 3, 4, 5
27	Senior Management Analyst	4
28		

1	Parks Manager	4
2	Senior and Social Services Manager	4
3	Special Events Coordinator	
4		
5	<u>Planning Commissioners</u>	*
6		
7	<u>Police Department</u>	
8	Police Chief	1, 2, 3, 4, 5
9	Assistant Police Chief	1, 2, 3, 4, 5
10	Police Captain	1, 2, 3, 5
11	Police Lieutenant	1, 2, 3, 5
12	Management Analyst	4
13		
14	<u>Public Works</u>	
15	Public Works Director/City Engineer	1, 2, 3, 4, 5
16	Engineering Services Manager	1, 2, 3, 5
17	Maintenance Operations Manager	4
18	Assistant Maintenance Operations Manager	4
19	Senior Civil Engineer	1, 2, 3, 5
20	Environmental Programs & Operations Manager	4
21	Solid Waste & Recycling Operations Supervisor	4
22	Senior Management Analyst	4
23	Traffic Engineer	1, 2, 3, 5
24	Traffic Engineer Analyst	4
25	Environmental Coordinator	3, 4, 5

Transportation Department

Transportation Director	4
Deputy Transportation Director	4
Senior Management Analyst	4
Fleet Services Manager	4
Transit Operations Manager	4
Transit Operations Analyst	4
Management Analyst	4

\*Disclosure obligations for these designated positions are set forth in Government Code § 87200, et seq. These positions are designated in this Conflict of Interest Code solely for disqualification purposes.

\*\*Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the Code subject to the following limitation: The City Manager 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 herein. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The City Manager'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.

**GENERAL PROVISIONS**

When a designated employee is required to disclose investments and sources of income, he/she need only disclose investments in business entities and sources of income, which do business in the jurisdiction, plan to do business in the jurisdiction or have done business in the jurisdiction, within the past two (2) years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction. When a designated employee is required to disclose interest in real property, he/she need only disclose real property, which is located in whole or in part within not more than two (2) miles outside the boundaries of the jurisdiction or within (2) miles of any land owned or used by the local government agency.

Designated employees shall disclose their financial interests pursuant to the appropriate disclosure category designated for each position.

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**DISCLOSURE CATEGORIES**

- Category 1: Persons in this category shall disclose all interests in real property.
- Category 2: Persons in this category shall disclose all investments.
- Category 3: Persons in this category shall disclose all sources of income.
- Category 4: Persons in this category shall disclose all investments in business entities and sources of income of the type which, within the past two years, have contracted with the designated employee's department to provide services, supplies, materials, machinery or equipment.
- Category 5: Persons in this category shall disclose any business entity in which the designated employee is a director, officer, partner, trustee, employee or holds any other position.
- Category 6: Persons in this category shall disclose all investments, interests in real property and sources of income subject to the regulatory, permit or licensing authority of the Board or Commission on which the member serves.

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<b>Disclosure Category:</b>	<b>Persons in this Category shall disclose the following:</b>	<b>700 Schedules</b>
1	All interests in real property	B
2	All investments	A-1, A-2
3	All sources of income	A-2, B, C, D, E, F
4	<p><b>Investments in business entities</b> of the type which, within the past two years, have contracted with the designated employee's department to provide services, supplies, materials, machinery or equipment</p> <p><b>Sources of income</b> of the type which, within the past two years, have contracted with the designated employee's department to provide services, supplies, materials, machinery or equipment</p>	<p>A-1, A-2</p> <p>A-2, B, C, D, E, F</p>
5	Any business entity in which the designated employee is a director, officer, partner, trustee, employee or holds any other position	A-2, C
6	<p>All <b>investments</b> subject to the regulatory, permit or licensing authority of the Board of Commission on which the member serves</p> <p>All <b>interests in real property</b> subject to the regulatory, permit or licensing authority of the Board or Commission on which the member serves</p> <p>All <b>sources of income</b> subject to the regulatory, permit or licensing authority of the Board or Commission on which the member serves.</p>	<p>A-1, A-2</p> <p>B</p> <p>A-2, B, C, D, E, F</p>