

# SBCERS

Santa Barbara County Employees' Retirement System

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**DATE:** April 3, 2024

**TO:** SBCERS Board of Retirement Operations Committee

**FROM:** Cristal Rodriguez, Deputy General Counsel

**RE:** **Conflict of Interest Code**

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**Recommended Action:**

That the Operations Committee recommend the Conflict of Interest Code with proposed revisions for approval by the Board of Retirement or provide direction to staff for further amendment or research on the policy.

**Summary:**

The Political Reform Act (Act) prohibits a public official from using their official position to influence a governmental decision in which they have a financial interest. The purpose of the SBCERS Conflict of Interest Code is to comply with the requirement that every state and local agency adopt a conflict of interest code that identifies all officials and employees within the agency who make governmental decisions based on the positions they hold and their respective financial interest disclosure requirements.

This review cycle, there are proposed updates to Exhibit B – Designated Position Categories, including the addition of the Controller position and moving the General and Deputy General Counsel positions from Disclosure Category 1 to the General Disclosure Category due to expanded roles and responsibilities. Other changes include minor grammatical changes. Pursuant to statutory requirements, SBCERS must review and make any necessary updates to the Code each even-numbered year, therefore there are no proposed changes to the regular review schedule.

**Attachments:**

- Proposed Conflict of Interest Code 2024 – Redline
- Proposed Conflict of Interest Code 2024