

August 28, 2024

Clerk of the Board

## 2024 Local Agency Biennial Notice

Name of Agency: Ventura County Employees' Retirement Association  
Mailing Address: 1190 S. Victoria Avenue, Suite 200  
Contact Person: Chris Ayala Phone No. (805) 339-4261  
Email: chris.ayala@ventura.org 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.)

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### 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

8/28/2024

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, 2024**, or by the date specified by your agency, if earlier, to: **E-Mail to: [form700clerk@ventura.org](mailto:form700clerk@ventura.org)**

or  
**Mail to: Clerk of the Board of Supervisors**  
**800 S. Victoria Avenue, L# 1920**  
**Ventura, CA 93009-1920**

**PLEASE DO NOT RETURN THIS FORM TO THE FPPC.**

**Redlined**  
**Conflict of Interest Code**

## **VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

### **CONFLICT OF INTEREST CODE**

The Political Reform Act, Government Code Section 81000 et seq., requires local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted a regulation (Cal. Code of Regs., tit. 2, sec. 18730) which contains the terms of a standard Conflict of Interest Code ("standard code"), which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings.

The terms of California Code of Regulations, title 2, section 18730, and any amendments to it duly adopted by the Fair Political Practices Commission, are hereby incorporated by reference and, along with the attached Appendix A, Appendix B, and Appendix C in which trustees, employees and consultants are designated and disclosure categories are set forth, constitute the Ventura County Employees' Retirement Association (VCERA) Conflict of Interest Code.

Pursuant to section 4 of the standard code, designated employees who do not file statements pursuant to Government Code section 87200 shall file Statements of Economic Interest with the VCERA Retirement Administrator. These statements shall be retained by VCERA.

The Board shall review this code at least every two (2) years to ensure that it remains relevant and appropriate.

\_\_\_\_\_  
Approved Date

\_\_\_\_\_  
Authorized Signature  
Ventura County Employees' Retirement Association

VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

CONFLICT OF INTEREST CODE

APPENDIX A

DESIGNATED POSITIONS

#OF POSITIONS	POSITION TITLE	DISCLOSURE CATEGORY
12	Director (Board Member)	1*
1	Retirement Administrator	1*
1	Chief Financial Officer	1*
2	Investment Consultant	1*
1	Investment Counsel	1*
1	Chief Investment Officer (CIO)	1*
1	General Counsel	1*
<u>1</u>	<u>Chief Operations Officer</u>	<u>12</u>
<u>1</u>	<u>Chief Technology Officer</u>	<u>2</u>

\* It has been determined that Board Members, the Retirement Administrator, the Chief Financial Officer, Investment Counsel and the Investment Consultants are positions that "manage public investments" and are required to file statements of economic interest pursuant to Government Code section 87200 et seq. No additional filing requirements for these positions are established by this code. See APPENDIX C.

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Approved 7/11/20222024

**VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

**CONFLICT OF INTEREST CODE**

**APPENDIX B**

**DISCLOSURE CATEGORIES**

Subject to the definitions set forth in the Political Reform Act and applicable regulations:

Category 1

Full Disclosure:

All investments, business positions and sources of income, including gifts, loans and travel payments, as directed on Form 700.

Category 2

All business positions, investments in, or income (including gifts and loans) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by VCERA.

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Approved 7/14/2022

**VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

**CONFLICT OF INTEREST CODE**

**APPENDIX C**

**AGENCY POSITIONS THAT MANAGE PUBLIC INVESTMENTS  
FOR PURPOSES OF SECTION 87200 OF THE GOVERNMENT CODE.**

Director (Board Members)	12
Retirement Administrator	1
Chief Financial Officer (CFO)	1
Investment Consultant	2
Investment Counsel	1
Chief Investment Officer (CIO)	1
General Counsel	1

**Amended**  
**Conflict of Interest Code**

## VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

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The Board shall review this code at least every two (2) years to ensure that it remains relevant and appropriate.

7/29/2024  
Approved Date



Authorized Signature: Aaron Grass, Chair  
Ventura County Employees' Retirement Association



# VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

## CONFLICT OF INTEREST CODE

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1	Investment Counsel	1*
1	Chief Investment Officer (CIO)	1*
1	General Counsel	1*
1	Chief Operations Officer	1
1	Chief Technology Officer	2

\* It has been determined that Board Members, the Retirement Administrator, the Chief Financial Officer, Investment Counsel and the Investment Consultants are positions that "manage public investments" and are required to file statements of economic interest pursuant to Government Code section 87200 et seq. No additional filing requirements for these positions are established by this code. See APPENDIX C.

# VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

## CONFLICT OF INTEREST CODE

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**VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

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