

Exhibit 2



COUNTY of VENTURA

County Executive Office
Clerk of the Board of Supervisors

CLERKS FOR:

Board of Supervisors
Air Pollution Control Board
Air Pollution Control District Hearing Board
Assessment Appeals Boards
Assessment Appeals Hearing Officer
City Selection Committee
Campaign Finance Ethics Commission
Farmworker Resource Program Advisory Committee
Fire Protection District Board of Appeals
Ventura County Consolidated Oversight Board

MEMORANDUM

DATE:

TO: [Filing Official – County Agency/Department/County Boards/Commissions]

FROM: Mia Martinez, Chief Deputy Clerk of the Board

SUBJECT: 2024 Biennial Review – Conflict of Interest Code

Pursuant to Government Code § 87306.5, every local government agency is required to review its conflict of interest code biennially and submit the Local Agency Biennial Notice to its code reviewing body. 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.

IMPORTANT: By **October 1, 2024**, the attached 2024 Local Agency Biennial Notice and amended code, if necessary, must be filed with the Clerk of the Board's Office as directed by the Board of Supervisors (i.e., your agency's code reviewing body).

The following questions will assist you in the review process and help you determine if an amendment to your agency's conflict of interest code is necessary.

- Is the current code more than five years old?
- Have there been any substantial changes to the agency's organizational structure since the last code was approved?
- Have any positions been eliminated or re-named since the last code was approved?
- Have any new positions been added since the last code was approved?
- Have there been any substantial changes in duties or responsibilities for any positions since the last code was approved?

If you answered "No" to all the questions, then check the box next to "No amendment is required" on the 2024 Local Agency Biennial Notice. Ensure the notice has been signed and dated by the Chief Executive Officer, or qualified personnel.

If you answered “Yes” to any of the questions, then the agency’s code needs to be amended. Please review the section “Amending a Conflict of Interest Code” below.

A copy of the [DepartmentName]'s current conflict of interest code, as approved by the Board of Supervisors, is available for viewing and download at <http://www.ventura.org/cob/coic>.

Amending a Conflict of Interest Code

When filing an amended conflict of interest code with the Clerk of the Board’s Office, please submit the following three documents:

- (1) The 2024 Local Agency Biennial Notice identifying the necessary amendments.
- (2) A red line version indicating each specific change in the conflict of interest code, Exhibit A (Designated Positions), and/or Exhibit B (Disclosure Categories).
- (3) A signed clean version of the amended conflict of interest code.

If your agency has not done so already, please consider using the attached *Template Conflict of Interest Code*, which contains essential language, and has been reviewed and approved by County Counsel to meet legal requirements. However, your agency’s code will be accepted as long as it meets the standards of the State of California Fair Political Practices Commission set forth at Title 2, Division 6, Section 18730 of the California Code of Regulations, and those set forth below.

Template instructions:

- On the Conflict of Interest Code, please insert the name of your agency/department where indicated, and have an authorized official sign and date to indicate formal approval of the code;
- On Exhibit A (Designated Positions), please list each position designated by your agency/department to file a Form 700, along with the number of officials in each position (including vacant positions that will be required to file once occupied);
- Finally, Gov. Code § 87200 et seq. requires all “officials who manage public investments” to disclose, in a Form 700, all of their economic interests pursuant to the Political Reform Act. Included with the Template Conflict of Interest Code is an “Appendix - Designating Officials Who Manage Public Investments” to assist your agency/department in identifying any such officials within your agency/department and designating the Filing Officer/Location for each. ***This designation does not apply to most agencies and departments – contact County Counsel with questions.*** If it does apply, please complete this Appendix or otherwise identify and designate the Filing Officer/Location for any such officials in your agency’s Conflict of Interest Code.

Date

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The Clerk of the Board's Office will submit all amended codes to the Board of Supervisors for adoption in the fall of 2024. A confirmation of approval will be sent to Filing Officials, and the approved code will be replaced on the website (<http://www.ventura.org/cob/coic>).

Filing Officer Duties

Effective as of January 1, 2015, the Clerk of the Board's Office became the Filing Officer for all County officials and staff (except for Gov. Code § 87200 filers) that your entity designated in its conflict of interest code. This has provided time savings by making each designated Form 700 filer eligible to use the electronic filing application eDisclosure. Additionally, the Clerk of the Board's Office became responsible for providing all notifications to your entity's designated filers and all other duties associated with the Filing Officer pursuant to 2 Cal. Code Regs. § 18115.

Required Submittals

Please submit the 2024 Local Agency Biennial Notice to the Clerk of the Board's Office no later than **October 1, 2024**. If amendments are required, please submit the red line and clean version as noted above.

Attachments and documents referenced in this memo can be accessed online at <http://www.ventura.org/cob/coic>.

Please feel free to contact me at 654-2251 if you have any questions or concerns.

Attachments: 2024 Local Agency Biennial Notice; How to Amend a Conflict of Interest Code