

**RESOLUTION NO. 2024-R<sup>061</sup>**

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, AMENDING THE CITY'S CONFLICT OF INTEREST CODE PURSUANT TO THE POLITICAL REFORM ACT, INCORPORATING BY REFERENCE, THE TERMS OF THE FAIR POLITICAL PRACTICES COMMISSION'S MODEL CONFLICT OF INTEREST CODE, AS SET FORTH IN TITLE 2 OF CALIFORNIA CODE OF REGULATIONS SECTION 18730, AND RESCINDING RESOLUTION NO. 2023-R026.

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, the Political Reform Act requires every local government agency to review its Conflict of Interest Code biennially to determine if it is accurate or, alternatively, that the Conflict of Interest Code must be amended; and

WHEREAS, it has been determined that the City's current Conflict of Interest Code, as adopted by Resolution No. 2023-R026, needs to be amended due to positions that have been created, eliminated, or revised as well as significant structural reorganization of City departments; and

WHEREAS, the Fair Political Practices Commission (FPPC) has adopted a regulation (Title 2 California Code of Regulations § 18730), which may be incorporated by reference, and which may be amended by the FPPC to conform to amendments in the Political Reform Act, after public notice and hearing conducted by the FPPC pursuant to the Administrative Procedure Act, Government Code §§ 11370, et seq.; and

WHEREAS, the City Council has determined that Appendix "A", attached hereto and incorporated herein, accurately sets forth a list of disclosure categories of reportable

1 financial interests along with Appendices "B" and "C", attached hereto, a list of designated  
2 officials and employees;

3 NOW, THEREFORE, the City Council of the City of Culver City, California, DOES  
4 HEREBY RESOLVE as follows:

5 1. The terms of Title 2 California Code of Regulations § 18730, and any  
6 amendments thereto, which have been duly adopted by the Fair Political Practices Commission  
7 (FPPC), are hereby incorporated by reference and, together with the attached Appendices "A"  
8 through "C", which designates City officials and employees and establishes respective financial  
9 disclosure categories, shall constitute the City of Culver City Conflict of Interest Code.  
10

11 2. Future amendments to the terms of Title 2 California Code of Regulations  
12 § 18730, which are duly adopted by the FPPC, shall become part of the Culver City Conflict of  
13 Interest Code upon the expiration of forty-five (45) days after receipt by the City Council, unless  
14 the City Council, by Resolution, decides not to adopt such amendments in whole or in part.  
15 The City Council hereby reserves the right not to adopt any provisions not within the jurisdiction  
16 of the FPPC pursuant to Government Code §§ 81000, et seq.  
17

18 3. Designated employees and elected and appointed officials identified in  
19 Appendix "B" shall file Statements of Economic Interests (Form 700 Statements) with the City  
20 Clerk, to whom the City Council hereby delegates the authority to carry out the duties of filing  
21 officer. The Form 700 Statements of designated employees shall be retained as official records  
22 by the City Clerk and shall be made available for public inspection and reproduction, in  
23 accordance with Government Code § 81008.  
24

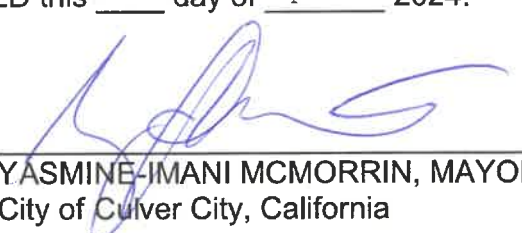
25 4. Pursuant to Government Code §§ 87200 et seq., upon receipt of Form 700  
26 Statements completed by City Council Members, Planning Commissioners, the City Manager,  
27  
28

1 the City Attorney and the Chief Financial Officer/City Treasurer, the City Clerk shall make and  
2 retain a copy and forward the original of these Form 700 Statements to the FPPC.

3 5. Resolution No. 2023-R026 is hereby rescinded.

4 6. This Resolution shall take effect on September 23, 2024.

5 APPROVED AND ADOPTED this 23rd day of September 2024.

6  
7  
8   
9 YASMINE-IMANI MCMORRIN, MAYOR  
City of Culver City, California

10 ATTEST:

APPROVED AS TO FORM:

11  
12   
13 JEREMY BOCCHINO,  
14 City Clerk

15  
16  
17   
18 HEATHER BAKER,  
19 City Attorney

## CONFLICT OF INTEREST CODE

### APPENDIX "A"

#### 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.

#### 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.  |

<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
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</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</p>

1 **CONFLICT OF INTEREST CODE**

2 **APPENDIX "B"**

3 **Designated Position**

**Disclosure Category**

4 **City Attorney**

5 City Attorney	*87200 Filer
6 Assistant City Attorney	1, 2, 3, 4, 5
7 Deputy City Attorney I, II, and III	1, 2, 3, 4, 5
8 Paralegal	1, 2, 3, 4, 5

9 **City Council**

10 Council Member	*87200 Filer
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11 **City Manager**

12 City Manager	*87200 Filer
13 Assistant City Manager	4
14 Assistant to the City Manager	4
15 City Clerk	1, 2, 3, 4, 5
16 Cultural Affairs Manager	4
17 Communications/Public information Manager	4
18 Deputy City Clerk	1, 2, 3, 4, 5
19 Economic Development Director	1, 2, 3, 4, 5
20 Economic Development Project Manager	1, 2, 3, 4, 5
21 Management Analyst - Cultural Affairs	4
22 Special Events Manager	4

23 **Consultants/Contract Employees**

24 All Departments and Divisions	**
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**Finance Department**

Chief Financial Officer/City Treasurer	*87200 Filer
Accounting and Investment Manager	1, 2, 3, 4, 5
Assistant Chief Financial Officer	1, 2, 3, 4, 5
Buyer	1, 2, 3, 4, 5
Finance Manager	1, 2, 3, 4, 5
Financial Systems/Purchasing Manager	1, 2, 3, 4, 5
Management Analyst	4
Management Payroll Analyst	4
Payroll Manager	1, 2, 3, 4, 5
Payroll Supervisor	4
Purchasing Supervisor	1, 2, 3, 4, 5
Revenue and Budget Supervisor	1, 2, 3, 4, 5
Senior Accountant	4
Senior Financial Systems Business Analyst	4
Senior Management Analyst	4
Warehouse Supervisor	2, 3, 4, 5

**Fire Department**

Fire Chief	1, 2, 3, 5
Assistant Fire Chief	1, 2, 3, 5
Battalion Chief	1, 2, 3, 5
Emergency Preparedness Coordinator	4
Fire Captain (including Training Officer and EMS Coordinator)	1, 2, 3
Fire Marshal	1, 2, 3, 5

**Housing and Human Services Department**

Housing and Human Services Director	1, 2, 3, 4, 5, 6
Enforcement Services Manager	1, 2, 3, 4, 5, 6
Housing and Human Services Project Manager	1, 2, 3, 4, 5, 6
Housing and Rent Stabilization Coordinator	1, 4
Housing and Rent Stabilization Manager	1, 2, 3, 4, 5
Housing Program Coordinator	1, 2, 3, 4, 5
Housing Programs Supervisor	2, 3, 4, 5
Housing Specialist	1, 4
Human Services and Crisis Intervention Manager	1, 2, 3, 4, 5, 6
Management Analyst	4
Mental Health Clinician	1, 2, 3, 4, 5
Mental Health Specialist	1, 2, 3, 4, 5
Structural Rehabilitation Specialist	1, 4

**Human Resources Department**

Director of Human Resources	1, 2, 3, 4, 5
Human Resources Analyst	4
Management Analyst	4
Risk Manager	1, 2, 3, 4, 5
Senior Human Resources and Equity Manager	1, 2, 3, 4, 5
Senior Human Resources and Equity Analyst	4

**Information Technology Department**

Chief Information Officer	4
Systems Support Manager	4



**Parks, Recreation and Community Services Department**

Parks, Recreation and Community Services Director	1, 2, 3, 4, 5
Parks Maintenance Supervisor	4
Recreation and Community Services Manager	1, 2, 3, 4, 5
Recreation and Community Services Supervisor	4
Senior Management Analyst	4

**Planning and Development Department**

Planning and Development Director	1, 2, 3, 4, 5
Advance Planning Manager	1, 2, 3, 4, 5
Building Official	1, 2, 3, 4, 5
Current Planning Manager	1, 2, 3, 4, 5
Deputy Building Official	1, 2, 3, 4, 5
Senior Building and Safety Inspector	1, 2, 3
Senior Management Analyst	4
Senior Planner	1, 2, 3, 4, 5

**Police Department**

Police Chief	1, 2, 3, 4, 5
Administrative Services Manager	4
Assistant Police Chief	1, 2, 3, 4, 5
Forensic Supervisor	4
Management Analyst	4
Police Captain	1, 2, 3, 5
Police Lieutenant	1, 2, 3, 5

**Public Works**

Public Works Director/City Engineer	1, 2, 3, 4, 5
Assistant Environment Programs and Operations Manager	4
Assistant Maintenance Operations Manager	4
Building Maintenance Supervisor	1, 2, 3, 4, 5
CIP <sup>1</sup> and Environmental Compliance Inspector	4
Engineering Services Manager	4
Environmental Coordinator	4
Environmental Programs and Operations Manager	4
Facility/Electrical Maintenance Supervisor	1, 2, 3, 4, 5
Maintenance Operations Manager	4
Management Analyst	4
Mobility and Traffic Engineering Manager	4
Senior Civil Engineer	1, 2, 3, 5
Senior Management Analyst	4
Senior Solid Waste and Recycling Crew Supervisor	4
Traffic Engineer	1, 2, 3, 5
Traffic Engineer Analyst	4

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<sup>1</sup> Capital Improvement Projects

**Transportation Department**

Chief Transportation Officer	4
Assistant Chief Transportation Officer	4
Facility Maintenance Supervisor	4
Fleet Services Manager	4
Management Analyst	4
Safety and Training Coordinator	5
Senior Management Analyst	4
Transit Operations Analyst	4
Transit Operations Manager	4
Transit Planning Manager	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 this Code subject to the following limitation: The City Manager may determine, in writing and in accordance with applicable law, which consultants, in "designated positions," are hired to perform a range of duties that do not involve making or participating in making governmental decisions on behalf of the City and, thus, are not required to comply with the broadest 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 Code.

1 CONFLICT OF INTEREST CODE

2 APPENDIX "C"

3 Designated Position

Disclosure Category

4 Building and Safety Appeals Board

5 Board Member

1, 2, 3, 4, 5, 6

6 Civil Service Commission

7 Commissioner

1, 2, 3, 4, 5

8 Consultants/Contract Employees

9 All Departments and Divisions

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10 Cultural Affairs Commission

11 Commissioner

1, 2, 3, 4, 5, 6

12 Finance Advisory Committee

13 Committee Member

1, 2, 3, 4, 5

14 Municipal Code Appeals Committee

15 Committee Member

1, 2, 3, 4, 5, 6

16 Parks, Recreation and Community Services Commission

17 Commissioner

1, 2, 3, 4, 5

18 Planning Commission

19 Planning Commissioner

\*87200 Filer

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7 that do not involve making or participating in making governmental decisions on behalf of  
8 the City and, thus, are not required to comply with the broadest 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 Code.

