

DATE SUBMITTED 9/10/2024
 SUBMITTED BY City Manager's Office
 DATE ACTION REQUIRED 9/18/24

COUNCIL ACTION
 PUBLIC HEARING REQUIRED
 RESOLUTION
 ORDINANCE 1ST READING
 ORDINANCE 2ND READING
 CITY CLERK'S INITIALS

**IMPERIAL CITY COUNCIL
 AGENDA ITEM**

SUBJECT: DISCUSSION/ACTION: 1. 2024 City of Imperial Biennial Notice	
DEPARTMENT INVOLVED: <u>City Attorney's Office/City Manager's Office</u>	
BACKGROUND/SUMMARY: The Political Reform Act requires every local government agency to conduct a biennial review of its Conflict of Interest Code and make revisions as appropriate. A conflict of interest code tells public officials, employees and consultants what financial interests must be disclosed (Form 700). By October 1, 2024, the biennial notice must be filed with the agency's code reviewing body (City Council). Upon review, it has been determined that the city's conflict of interest code requires updates. The amended code will be brought back to the City Council for final approval and adoption. Attachment: 2024 City of Imperial Biennial Notice	
FISCAL IMPACT: NOT TO EXCEED N/A	FINANCE INITIALS <u>VMS</u>
STAFF RECOMMENDATION: File the 2024 Conflict of Interest Code Biennial Notice and direct staff to amend and update the City of Imperial's Conflict of Interest Code and bring back for approval by the City Council within 90 days.	DEPT. INITIALS <u>WDE</u>
MANAGER'S RECOMMENDATION: <i>approve staff recommendation</i>	CITY MANAGER'S INITIALS <u>DHm</u>
MOTION: SECONDED: APPROVED <input type="checkbox"/> REJECTED <input type="checkbox"/> AYES: DISAPPROVED <input type="checkbox"/> DEFERRED <input type="checkbox"/> NAYES: ABSENT: REFERRED TO:	

2024 Conflict of Interest Code Biennial Notice Instructions for Local Agencies

The Political Reform Act requires every local government agency to review its conflict of interest code biennially. A conflict of interest code tells public officials, governmental employees, and consultants what financial interests they must disclose on their Statement of Economic Interests (Form 700).

By **July 1, 2024**: The code reviewing body must notify agencies and special districts within its jurisdiction to review their conflict of interest codes.

By **October 1, 2024**: The biennial notice must be filed with the agency's code reviewing body.

The FPPC has prepared a 2024 Local Agency Biennial Notice form for local agencies to complete or send to agencies within its jurisdiction to complete before submitting to the code reviewing body. The City Council is the code reviewing body for city agencies. The County Board of Supervisors is the code reviewing body for county agencies and any other local government agency whose jurisdiction is determined to be solely within the county (e.g., school districts, including certain charter schools). The FPPC is the code reviewing body for any agency with jurisdiction in **more than one county** and will contact them.

The Local Agency Biennial Notice is not forwarded to the FPPC.

If amendments to an agency's conflict of interest code are necessary, the amended code must be forwarded to the code reviewing body for approval within 90 days. An agency's amended code is not effective until it has been approved by the code reviewing body.

If you answer yes, to any of the questions below, your agency's code probably needs to be amended.

- 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 have any questions or are still not sure if you should amend your agency's conflict of interest code, please contact the FPPC. Additional information including an online webinar regarding how to amend a conflict of interest code is available on [FPPC's website](#).

2024 Local Agency Biennial Notice

Name of Agency: City of Imperial
Mailing Address: 420 S Imperial Avenue
Contact Person: Aimee Osuna Phone No. 760 355-3334
Email: aosuna@imperial.ca.gov Alternate Email: cityclerk@cityofimperial.org

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.)

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

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:

(PLACE RETURN ADDRESS OF CODE REVIEWING BODY HERE)

PLEASE DO NOT RETURN THIS FORM TO THE FPPC.