

**Colusa Local Agency Formation Commission**

**Special Meeting Agenda**

**Thursday – August 9, 2018**

**3:00 PM**

**Board of Supervisors Chambers  
546 Jay Street  
Colusa, CA.**

**1. Call to Order/Roll Call**

**Commissioners**

Brandon Ash (Chair, Public)  
Denise Carter (Vice-Chair County)  
John Loudon (County)  
Tom Reische (Colusa, City)  
Alfred Sellers, (Williams, City)

**Alternates**

Kent Boes (County Alternate)  
Roberto Mendoza (City Alternate)  
Mary Winters, (Public Member Alternate)

**Staff**

John Benoit, Executive Officer  
P. Scott Browne, Legal Counsel  
Lora Cecon, Clerk to the Commission

**2. Election of Chair and Vice-Chair for fiscal year 2018-2019**

*a) Election of Chair*

*b) Election of Vice-Chair*

**3. Consider Minutes from June 7, 2018**

*a. Consider approval of the June 7, 2018 LAFCo minutes*

**4. Public Comment**

This is the time for the public to address the Commission on any matter not on the agenda. Testimony related to an item on the agenda should be presented at the time that item is considered

**5. Consent Agenda**

*a. Payment of claims for the months of June and July 2018*

**6. Correspondence:**

*a) Letter from CALAFCo Ad Hoc Finance Committee RE: Calafco Finances*

7. **Workshop regarding Reclamation, Levee and Flood Control Districts MSR and SOI (hard copies handed out at the June 7, 2018 LAFCo meeting)**
  - a. *Receive MSR – SOI report and conduct workshop and schedule a public hearing for the next available LAFCo meeting.*
  
8. **2018 Biennial Notice and review of LAFCo’s Conflict of Interest Code.**
  - a. *Review conflict of interest code and authorize Executive Officer to file the Biennial Notice with the County with no changes or updates necessary.*
  
9. **Presentation Workshop regarding CEQA Exemptions – Scott Browne**
  
10. **Appoint Voting Member to represent Colusa LAFCo at the Annual Calafco Conference in October**
  - a. *Appoint voting member to represent Colusa LAFCo at the Calafco Annual Conference.*
  
11. **Executive Officer’s Report:**
  
12. **Commissioner Reports - Discussion**

*This item is placed on the agenda for Commissioners to discuss items and issues of concern to their constituency, LAFCO, and legislative matters*
  
13. **Adjourn to the next regular meeting 3:00 pm on September 6, 2018**

**Any member appointed on behalf of local government shall represent the interests of the public as a whole and not solely the interest of the appointing authority Government Code Section 56325.1**

Pursuant to Government Code Section 54954.2, Commission members may make a brief announcement or report on activities. Commission members may also provide a reference to staff or other resources for factual information, request staff to report back to the Commission at a subsequent meeting concerning any matter, or take action to direct staff to place a matter of business on a future agenda.

*Public Comment*

Members of the public may address the Commission on items not appearing on the agenda, as well as any item that does appear on the agenda, subject to the following restrictions:

- Items not appearing on the agenda must be of interest to the public and within the Commission’s subject matter jurisdiction.
- No action shall be taken on items not appearing on the agenda unless otherwise authorized by Government Code Section 54954.2 (known as the Brown Act, or California Open Meeting Law).
- The total amount of time allotted for receiving public comment may be limited to 15 minutes.
- Any individual’s testimony may be limited to 5 minutes. Time to address the Commission will be allocated on the basis of the number of requests received.

*Public Hearings*

Members of the public may address the Commission on any item appearing on the agenda as a Public Hearing. The Commission may limit any person’s input to 5 minutes. Written statements may be submitted in lieu of or to supplement oral statements made during a public hearing.

*Agenda Materials*

Materials related to an item on this agenda submitted to the Commission after distribution of the agenda are available for review for public inspection in the Colusa County Clerk’s office located at the Colusa County Courthouse 546 Jay

Street, Colusa CA. [such documents are also available on the Colusa LAFCO website as noted below to the extent practicable and subject to staff's ability to post the documents prior to the meeting].

*Accessibility*

An interpreter for the hearing-impaired may be made available upon request to the Executive Officer 72 hours before a meeting. The location of this meeting is wheelchair-accessible.

*Disclosure & Disqualification Requirements*

Pursuant to Government Code Sections 56100.1, 56300(b), 56700.1, and 81000 et seq., and Colusa LAFCO's Policies and Procedures for the Disclosure of Contributions and Expenditures in Support of and Opposition to Proposals, any person or combination of persons who directly or indirectly contribute \$1000 or more or expend \$1000 or more in support of or opposition to a change of organization or reorganization that has been submitted to Colusa LAFCO must comply with the disclosure requirements approved by Colusa LAFCO. These requirements contain provisions for making disclosures of contributions and expenditures at specified intervals. Additional information may be obtained at the Colusa County Elections Department 546 Jay Street, Colusa, CA 95932. (530) 458-0500

A LAFCO Commissioner must disqualify herself or himself from voting on an application involving an "entitlement for use" (such as an annexation or sphere amendment) if, within the last twelve months, the Commissioner has received \$250 or more in campaign contributions from the applicant, any financially interested person who actively supports or opposes the application, or an agency (such as an attorney, engineer, or planning consultant) representing the applicant or an interested party. The law (Government Code Section 84308) also requires any applicant or other participant in a LAFCO proceeding to disclose the contribution amount and name of the recipient Commissioner on the official record of the proceeding.

Contact LAFCO Staff LAFCO staff may be contacted at (530) 458-0593 or by mail at Colusa LAFCO P.O. Box 2694, Granite Bay Ca 95746 or by email at [lafco@countyofcolusa.org](mailto:lafco@countyofcolusa.org) or [johnbenoit@surewest.net](mailto:johnbenoit@surewest.net) or by Fax (916) 797-7631

Webpage Reports, agendas, minutes and general information about LAFCO are available on the LAFCO Webpage at [www.colusacountylafco.org](http://www.colusacountylafco.org)

LOCAL AGENCY FORMATION COMMISSION  
COLUSA COUNTY  
MINUTES OF MEETING  
June 7, 2018

PRESENT:

JOHN LOUDON, County Member  
ALFRED SELLERS, JR., City Member  
TOM REISCHE, City Member  
BRANDON ASH, Chair, Public  
DENISE CARTER, County Member

ALSO PRESENT:

LORA CECCON, Clerk  
JOHN BENOIT, Ex. Officer  
P. SCOTT BROWNE, Legal  
M. WINTERS, Public Alternate

1. **Call to Order/Roll Call**

The meeting was called to order at 3:00 p.m. There was a quorum present.

2. **Consider Minutes for May 3, 2018**

**On motion of J. Loudon, second by T. Reische, the commission approved the minutes for May 3, 2018, motion carried by roll call vote.**

3. **Public Comment – None**

4. **Consent Agenda – Moved to later on the agenda.**

5. **Correspondence:** John reported that the correspondence received is related to the CCWD reorganization.

6. **Request from the Colusa County Water District to review conditions of approval for the Annexations and Detachments to and from the District (File 2017-0001).**

John stated that he has received color photos and letters; everything has been posted to the website.

D. Carter recommended, due to the concerns expressed by multiple people, that the decision Lafco made be vacated, and we start over fresh, making sure that everything is done correctly. John responded that there are two parts to this project; the detachments and the annexations. There is no problem with the annexations.

S. Browne stated that Lafco acted on this application, and there was no request for reconsideration within the 30 day requirement. There is no authority to re-open.

David R.E. Aladjem, attorney for the Colusa County Water District, stated that there will be many lawsuits if this continues down this path. The district would be happy to file a new petition for detachment, create jurisdiction and move

forward with a clean slate. S. Browne stated that he is concerned that Mr. Minasian's client would not agree. Mr. Aladjem responded that if it is conditioned upon his consent, the district will not be happy. He stated that the district is already being sued over this. More discussion followed.

Mr. Aladjem stated that everyone is happy with the annexations; they should move forward, there is no dispute. As far as the detachments, the district will re-file, and it will be exactly the same. Scott stated that we will hold off on completing the current proposal until the new one is considered.

Mr. Aladjem asked Lafco to schedule a public hearing date as this has already gone on too long. A Public Hearing was set for August 9, 2018 at 3:00 p.m.

7. **Public Hearing #1: Glenn Colusa Irrigation District (GCID) request to detach approximately 208-acres from the GCID (in Glenn County) and being in the City of Willows (Lafco File 2016-0001).**

#### **3:31 – Opened Public Hearing**

John presented information stating that this project has been going on for about 3 years. The area is about 208 acres in the city limits. They have prepared an environmental review; planned and zoned for urban development. Once the detachment is approved, they will receive city water. John assumes it was the Colusa Lafco that allowed the city to annex without being detached from the irrigation district; so, he is recommending approval of the SOI and approval of the detachment subject to the terms and conditions in the report.

#### **3:40 – Closed Public Hearing**

**On motion of T. Reische, second by J. Loudon, the Commission approved Resolution 2018-0004 adopting a Sphere of Influence amendment for the Glenn Colusa Irrigation District consisting of removing 208-acres more or less of the incorporated territory from the District's Sphere of Influence, motion carried by roll call vote. (5-0-0)**

8. **Request by LAFCo Counsel for amendment of his Legal Agreement to include costs and expenses for participation in Calafco Activities**

Scott explained the need for the amendment stating that he is already doing the work; it just isn't in the contract. The following language will be included under the "compensation" section of the legal agreement:

*"The monthly payment is compensation not only for time spent directly on Colusa LAFCo business, but also for the substantial Attorney investment of time providing special seminars put on by Colusa LAFCo such as AB 1234 training and Best Management Practices for Small Districts, and also working with*

*CALAFCo, the Legislative Committee of CALAFCo, CALAFCo University, and attending and presenting in the CALAFCo conferences, all of which benefits Colusa LAFCo.*

*Client further agrees to reimburse all costs and expenses advanced by Attorney on behalf of client, such as facsimile charges, postage, photocopying, travel, legal research, conference registration fees, etc. When costs are incurred for joint CALAFCo projects and workshops such as those listed above, client will be billed only a proportionate share, i.e., the costs will be shared with Attorney's other flat rate LAFCo clients."*

**On motion of T. Reische, second by J. Loudon, the commission moved to authorize the Chair to sign the final contract amendment, motion carried by roll call vote.**

**9. Public Hearing #2: Final 2018-2019 LAFCo Budget**

**3:44 P.M. – Opened Public Hearing**

John stated that the final budget is identical to the proposed budget. He informed the commission that a \$50,000 reserve is becoming inadequate and Lafco should consider adding to it.

**3:46 p.m. – Closed Public Hearing**

**On motion of D. Carter, second by J. Loudon, the commission approved Resolution 2018-0006 adopting a final budget for FY 2018-2019, motion carried by roll call vote. (5-0-0)**

**3:47 p.m. – T. Reische left the meeting. Tom is interested in attending Calafco.**

**10. Review Proposed Letters of Support for SB-929, AB 2238 and AB 2268 considering support for the following bills:**

- a. SB-929 (McGuire) Special District's websites**
- b. AB 2238 (Aguiar-Curry) LAFCo's and Hazard Mitigation Plan – General Plan Safety Elements**
- c. AB-2268 (Reyes) restoration of funding for inhabited annexations**

John stated that the letters are ready to go, and copies are included in today's packet.

**On motion by D. Carter, second by J. Loudon, the commission authorized the chair to sign the letter in support of SB-929, motion carried by roll call vote.**

**On motion by A. Sellers Jr., second by J. Loudon, the commission authorized the chair to sign the letter in support of AB-2238, motion carried by roll call vote.**

**On motion by J. Loudon, second by A. Sellers Jr., the commission authorized the chair to sign the letter in support of AB-2268, motion carried by roll call vote.**

- 11. Authorize Staff and Commissioners to attend the Calafco annual conference at the Tenaya Lodge near Yosemite October 3-5, 2018**

John stated that, once again, the cost for staff to attend will be split between represented counties. J. Loudon and T. Reische will also attend. John will get the information to A. Sellers Jr.; he will consider attending as well.

**Item #4. Consent Agenda**

**On motion of D. Carter, second by J. Loudon, the commission approved payment of claims for the month of May 2018, motion carried by roll call vote.**

- 12. Calafco Achievement Awards 2018 (due August 1, 2018)**

**No nominations.**

- 13. Consider nomination for the Calafco Board of Directors (due September 4, 2018): City Member or Public Member**

**No nominations.**

- 14. Executive Officer's Report**

John handed out copies of the Reclamation Districts MSR, SOI and map. All of this information has been posted to the website. John stated that the map shows all of the reclamation districts in the county. Since the commission just received copies, discussion will be postponed until the August meeting.

- 15. Commissioner Reports – Discussion - None**

- 16. Adjourn to the next regular meeting 3:00 p.m. on July 5, 2018**

**There will be no July meeting; next meeting August 9, 2018 as a special meeting.**

**The meeting was adjourned at 4:08 p.m.**

# Colusa Local Agency Formation Commission

## CLAIMS

For June and July 2018

Authorize payment of the following claims:

FY 2018-2019 EXPENSES:

July 2, 2018	Staff Svcs and Exp & MSR and SOI – June 2018	\$ 8,248.47
July 2, 2018	Frontier Phone June 7, 2018	\$ 44.96
5.16.18- 6.15.2018	Legal Services P. Scott Browne	\$ 2,000.00
July 2, 2018	Calafco Conf. Registrations Reische & Loudon.	\$ 1,040.00
<b>TOTAL:</b>		<b>\$ 9,253.43</b>
August 1, 2018	Staff Svcs and Expenses – July 2018	\$ 4,690.25
July 7, 2018	Frontier Phone July 7, 2018	\$ 38.05
July 15, 2018	Legal Svcs. Browne ending 7.15.18	\$ 2,000.00
<b>TOTAL:</b>		<b>\$ 6,728.30</b>

**DATED:** August 9, 2018

**APPROVED:** August 9, 2018

\_\_\_\_\_  
Brandon Ash, Chair or Denise Carter, Vice-Chair  
Colusa Local Agency Formation Commission

Attest:

\_\_\_\_\_  
John Benoit  
Executive Officer



Shadow Accounting  
2017-2018

EXPENSE	Executive Off. Cont 53180	Clerical Support Workers 53180	Comp 51035	Atty Contract 53180	Insurance 53100	Office Supplies 53170	Postage 53171	Copies 53170	Membership 53150
CALAFCO Dues 18-19	48000.00	3657.00	50.00	24000.00	1818.00	375.00	500.00	1500.00	926.00
SDRMA Insurance 18-19					-1698.00				-925.00
Staff Servics June 2018	-4000.00	-175.00					-12.64	-101.60	
Frontier Phone June 7, 2018									
Browne Legal Svcs 5.16,2018-6.15.2018				-2000.00					
Conf. Registration Reische & Loudon									
Staff Svcs July 2018	-4000.00						-3.09	-10.00	
Front ph July 7, 2018									
Browne Legal Svcs 6.15 -7.17, 2018				-2000.00					

<b>Total Expended in FY 17-18</b>	<b>-8000.00</b>	<b>-175.00</b>	<b>0.00</b>	<b>-4000.00</b>	<b>-1698.00</b>	<b>0.00</b>	<b>-15.73</b>	<b>-111.60</b>	<b>-925.00</b>
<b>Total Remaining in FY 17-18</b>	<b>40000.00</b>	<b>3482.00</b>	<b>50.00</b>	<b>20000.00</b>	<b>120.00</b>	<b>375.00</b>	<b>484.27</b>	<b>1388.40</b>	<b>1.00</b>



July 25, 2018

Mr. John Benoit  
Executive Officer  
Colusa LAFCo  
PO Box 2694  
Granite Bay, CA 95746

Dear John,

As you may know, last October the CALAFCO Board of Directors appointed an ad hoc finance committee tasked with a thorough review of CALAFCO's current and future financial state. The Board reported to the membership during the 2017 Annual Business meeting that the Association, for many, many years has functioned with an annual budget in which operational expenses exceed member LAFCo dues. This has resulted in a continuing reliance on the carryover and Annual Conference net profit to help balance the budget.

The work of this ad hoc committee is ongoing and wide in scope. To date there has been much work in terms of a detailed review of CALAFCO's expenses (literally line by line) as well as current revenue sources. The committee is tasked with finding options for consideration to close the budget gap between operational expenses and revenues.

As the ad hoc committee dives into the review of revenue sources, they are gathering data on things such as member LAFCo budgets (both revenue and expenses) and county population.

To that end, the ad hoc committee is asking for your assistance. The committee identified eight (8) member LAFCOs whose budgets they wish to review in detail to better understand revenue sources, costs, and how LAFCOs operate. These eight LAFCOs represent a spectrum of diversity including special district representation (or not), urban-suburban-rural, equitable regional diversity, and size of the LAFCo. Your LAFCo was selected as one of the eight.

The ad hoc committee respectfully requests you provide CALAFCO with a copy of your recently adopted FY 2018-19 budget. In addition, the committee would like to know the following information, if it is not readily available in your budget:

1. In terms of revenue, what are the sources and amounts paid to your LAFCo?
2. What, if any, is the travel budget your LAFCo has for staff and commissioners to attend CALAFCO functions or other educational and networking opportunities?
3. What, if any, are services provided to your LAFCo by the county, any city or district (or some other entity) and at what cost? If it is in-kind services, please note that. The committee also wishes to understand the cost value of the in-kind services received. (An example of this would be staff costs for County employees (IT/mapping services, auditor/assessor, analyst in the CAO office, regional planning staff, etc.).
4. Contingency amount
5. Fund Reserve amount

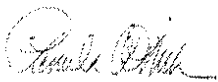
The ad hoc committee would appreciate receiving this information as soon as you are able to provide it.

On behalf of the ad hoc committee, I thank you for sharing this budget information with them. By having this information for review, they will gain a better understanding of the finances of our diverse member LAFcos. This data will be one of a large number of data points they are using to be better informed as they consider all options for closing CALAFCO's budget gap.

Please do not hesitate to contact me or the committee chair, Mike McGill, should you have any questions.

Thank you in advance for your prompt response to the ad hoc committee's request. And, as always, we thank you for your valued CALAFCO membership.

Sincerely,



Pamela Miller  
Executive Director

Cc: CALAFCO ad hoc financial committee members  
Clark Alsop, CALAFCO legal counsel

**Ad hoc committee members:**

Roger Anderson – Santa Cruz LAFCo, Former Board Chair

Cheryl Brothers – Orange LAFCo, Board member, southern region

Bill Connelly – Butte LAFCo, Board member, northern region

Jerry Gladbach – LA LAFCo, Former Board Chair

Blake Inscore – Del Norte LAFCo

Gay Jones (ex officio member) – Sacramento LAFCo, Board Chair

Mike McGill – Contra Costa LAFCo, Board member, coastal region (recent Treasurer)

Anita Paque – Calaveras LAFCo, Board member, central region

**Provider** Special District Risk Management Authority  
 1112 'I' Street, Suite 300  
 Sacramento, California 95814  
 800.537.7790 www.sdrma.org



**Member** Local Agency Formation Commission of Colusa  
 Post Office Box 2694  
 Granite Bay, California 95746

Member Number: 7528

This is to certify that coverages listed below have been issued to the Member named above for the period indicated. This certificate is not an insurance policy or an agreement of coverage and does not amend, extend or alter the coverage afforded by the agreements listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the coverage described herein is subject to all the terms, exclusions, and conditions of the specific coverage document. This certificate of coverage evidences the limits of liability in effect at the inception of the agreements shown; limits shown may have been reduced by paid claims. This certificate is issued as a matter of information only and confers no rights upon the certificate holder.

Type of Coverage	Policy Number	Effective Date	Expiration Date	Limits
<b>General Liability</b>	LCA-SDRMA-201819	7/1/2018	7/1/2019	Per Occurrence
Bodily Injury				\$ 2,500,000
Property Damage				\$ 2,500,000
Public Officials Personal				\$ 500,000
Employment Benefits				\$ 2,500,000
Employee/Public Officials E & O				\$ 2,500,000
Employment Practices Liability				\$ 2,500,000
Employee/Public Officials Dishonesty	EDC-SDRMA-201819			\$ 1,000,000
<b>Auto Liability</b>	LCA-SDRMA-201819	7/1/2018	7/1/2019	Per Occurrence
Auto Bodily Injury				\$ 2,500,000
Auto Property Damage				\$ 2,500,000
Uninsured Motorist	UMI-SDRMA-201819			Limits on File

Paul Frydendal - Chief Operating Officer

## Colusa Local Agency Formation Commission

### Memorandum

August 9, 2018

TO: LAFCo Commissioners

FROM: John Benoit, Executive Officer

SUBJECT: Conflict of Interest Code.

Attachments: Colusa LAFCO's Conflict of Interest Code  
2018 Local Agency Biennial Notice

Government code section 87300 et. seq. (the Political Reform Act) requires each local government agency to keep a conflict of interest code and update it to reflect changes that occur in the organization of an entity. The Local Agency Formation Commission (as well as other local agencies) is required to review and amend its Conflict of Interest code on even-numbered years. A biennial notice is normally sent out by the County Clerk or other official designated by the Board of Supervisors during the summer of even numbered years to each agency required to review its Conflict of Interest Code. After review or approval of the Conflict of Interest Code, LAFCO is required to submit any proposed changes to the Board of Supervisors acting as the code reviewing body.

Government code section 87311 requires review of a conflict of interest code to be carried out under procedures which guarantee to officers, employees, members and consultants of the agency and to residents of the County adequate notice and a fair opportunity to present their views. A conflict of interest code was adopted on November 6, 2003. To engage the public, a notice of Public Hearing was published prior to LAFCO adopting amending its conflict of interest code (which was included in LAFCo's Bylaws on November 6, 2003 (Resolution 2003-04)). Since that time LAFCO has found no amendments to that code necessary.

#### Recommendation:

Direct the Executive Officer to sign and transmit the 2018 Local Agency Biennial Notice to the County Clerk (or person designated by the Board of Supervisors) declaring LAFCO has reviewed its Conflict of Interest code and no amendment is required at this time.

John Benoit, Executive Officer      lafco@countyofcolusa.org  
P.O. Box 2694 Granite Bay, CA 95746  
(530) 458-0593 ph. (916) 797-7631 fax.

**Colusa Local Agency Formation Commission  
LAFCO Bylaws**

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*Appendix 3*

**Colusa County  
Local Agency Formation Commission**

**Conflict of Interest Code**

The Political Reform Act, Government Code Section 81000, et seq., requires state and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted Title 2, California Code of Regulations, Section 18730, which contains the terms of a standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings conducted by the Fair Political Practices Commission. Therefore, the terms of Title 2 California Administrative Code Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the following list of designated and disclosure requirements constitute the Conflict of Interest Code of the Local Agency Formation Commission of Colusa County.

Designated officers and employees shall file Statements of Economic Interest (Form 730) with LAFCO, who will retain copies, and forward the original Statements for all Commissioners and the Executive Officer to the Colusa County Clerk. The original statements for all other designated employees will be retained by LAFCO.

**Designated Employees and Disclosure Requirements**

Designated officers and employees include the following:

- A) All members and alternate members of this Commission
- B) The Executive Officer
- C) Legal Counsel to the Commission
- D) Consultants employed by the Commission. The Chair of the Commission may determine in writing that a particular consultant, although a "designated employee," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this Code. 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. Such determination shall be a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code.

Designated employees and officers shall disclose the following:

All investments, sources of income or interests in real property within the Colusa Local Agency Formation Commission jurisdiction and business positions in which the designated employee or officer is a director, officer, partner, trustee, employee or holds any position of management, and which business does any contracting with the Local Agency Formation Commission, or which is located within the Local Agency Formation Commission jurisdiction.

# 2018 Local Agency Biennial Notice

Name of Agency: Colusa LAFCo  
Mailing Address: P.O. Box 2694 Granite Bay, CA 96746  
Contact Person: John Benoit Phone No. 530.458.0593  
Email: johnbenoit@surewest.net 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.*

August 9, 2018

\_\_\_\_\_  
*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, 2018**, 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.**