

**RESOLUTION NO. 2025-01**

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE CITIES ASSOCIATION  
OF SANTA CLARA COUNTY JOINT POWERS AGENCY AD AMENDING THE  
CONFLICT OF INTEREST CODE**

**WHEREAS**, pursuant to the California Political Reform Act of 1974, Government Code Section 87303, the Cities Association of Santa Clara County Joint Powers Agency (“Cities Association”) adopted a conflict of interest code; and

**WHEREAS**, the conflict of interest code also incorporates the provisions of Title 2 of the California Code of Regulations Section 18730, as may be amended from time to time; and

**WHEREAS**, the Cities Association desires to amend the conflict of interest code to add a new designated position; and

**WHEREAS**, the following amendment of the conflict of interest code must also be approved by the Santa Clara County Board of Supervisors as the Cities Association’s code reviewing body pursuant to Government Code Section 82011.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE CITIES ASSOCIATION THAT:**

1. The terms of the standard conflict of interest code provisions set forth in Title 2 of the California Code of Regulations Section 18730, as may be amended from time to time, are hereby adopted, incorporated by reference and shall serve, together with the Appendices attached hereto, as the Conflict of Interest Code for the Cities Association.
2. The list of designated positions attached hereto as Appendix A is hereby amended.
3. The list of disclosure categories is attached hereto as Appendix B.
4. Persons holding a designated position listed in Appendix A must file their Statement of Economic Interests (“Form 700”) with the Cities Association’s filing official. If a statement is received in signed paper format, the filing official shall make and retain a copy and forward the original of this statement to the filing officer, the County of Santa Clara Clerk of the Board of Supervisors. If a statement is electronically filed using the County of Santa Clara’s Form 700 e-filing system, both the filing official and the County of Santa Clara Clerk of the Board of Supervisors will receive access to the e-filed statement simultaneously. The Cities Association shall make the statements available for public inspection and retain them for at least seven years, pursuant to Government Code sections 81008-09.
5. The amended Conflict of Interest Code of the Cities Association shall become effective

upon the date of its approval by the Santa Clara County Board of Supervisors, the Cities Association's code reviewing body.

ADOPTED this 11th day of September 2025, by the following vote:

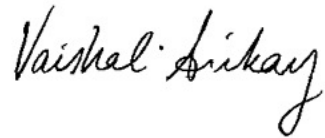
AYES: 12

NOES: 0

ABSENT: 3

ABSTENTION: 0

ATTEST:



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Vaishali Sirkay, Executive Director

APPROVED:



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Larry Klein, Chair of the Board of Directors

APPENDIX A

Designated Positions

<b>Designated Position</b>	<b>Disclosure Category</b>
Member of the Board of Directors	1
Alternate Member of the Board of Directors	1
Executive Committee Member	1
Consultant <sup>1</sup>	2
Newly Created Position	*

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<sup>1</sup> This includes, but is not limited to, any individual serving in the role of Executive Director or General Counsel through contract with the Cities Association.

## APPENDIX B

### Disclosure Categories

#### **Category 1:**

Persons in this category shall disclose:

- (a) investments, business positions, and income, including gifts, loans, and travel payments, in or from sources which are located in, doing business in, planning to do business in, or has done business during the previous two years in Santa Clara County; and
- (b) interests in real property located entirely or partly within Santa Clara County or within two miles of the borders of Santa Clara County, or within two miles of any land owned or used by the Cities Association.

#### **Category 2:**

Consultants, as defined under the Political Reform Act, shall disclose pursuant to disclosure category 1 subject to the following limitation: The Executive Director in consultation with the General Counsel may determine in writing that a particular consultant, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to file according to the broadest disclosure category, but should instead comply with more tailored disclosure requirements specific to that consultant’s duties. Such a determination shall include a description of the consultant’s duties and, based upon that description, a statement of the appropriate extent of disclosure requirements. All such determinations shall be made using the Fair Political Practices Commission Form 805, are public records, and shall be retained for public inspection along with this conflict of interest code.<sup>2</sup>

#### **\* Newly Created Positions**

If the Cities Association has a newly created position that must file statements of economic interests, the newly created position shall disclose pursuant to disclosure category 1 subject to the following limitation: The Executive Director in consultation with the General Counsel may determine in writing that a particular newly created position, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to file according to the broadest disclosure category, but should instead comply with more tailored disclosure requirements specific to that newly created position’s duties. Such a determination shall include a description of the newly created position’s duties and, based upon that description, a statement of the appropriate extent of disclosure requirements. All such determinations shall be made using the Fair Political Practices Commission Form 804, are

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<sup>2</sup> Notwithstanding this process, the individuals serving in the role of Executive Director or General Counsel shall disclose their financial interests under disclosure category 1.

public records, and shall be retained for public inspection along with this conflict of interest code.

When the Cities Association has a newly created position that must file statements of economic interests, the Cities Association filing official shall contact the County of Santa Clara Clerk of the Board of Supervisors Form 700 division to notify it of the new position title to be added in the County's electronic Form 700 record management system, known as eDisclosure. Upon this notification, the Clerk's office shall enter the actual position title of the newly created position into eDisclosure and the Cities Association's filing official shall ensure that the name of any individual(s) holding the newly created position is entered under that position title in eDisclosure.

Additionally, within 90 days of the creation of a newly created position that must file Statements of Economic Interests, the Cities Association shall update this conflict-of-interest code to add the actual position title in its list of designated positions, and submit the amended conflict of interest code to the County of Santa Clara Office of the County Counsel for code-reviewing body approval by the County Board of Supervisors. (Gov. Code Sec. 87306.)