



BOARD OF SUPERVISORS  
AGENDA LETTER

Agenda Number:

Clerk of the Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101  
(805) 568-2240

**Department Name:** County Counsel  
**Department No.:** 0710  
**For Agenda Of:** October 3, 2023  
**Placement:** Administrative  
**Estimated Time:**  
**Continued Item:** No  
**If Yes, date from:**  
**Vote Required:** Majority

---

**TO:** Board of Supervisors

**FROM:** Department Rachel Van Mullem, County Counsel, (805) 568-2950  
Director(s)  
Contact Info: Bo Bae, Deputy County Counsel, (805) 568-2950

**SUBJECT:** 2022 Biennial Review: Amendments to the Conflict of Interest Code of the Manzanita Public Charter School

---

**County Counsel Concurrence**

As to form: Yes

Other Concurrence: N/A

As to form: N/A

**Auditor-Controller Concurrence**

As to form: N/A

**Recommended Actions:**

That the Board of Supervisors:

- A. Approve the amended Conflict of Interest Code of the Manzanita Public Charter School (Attachment D) and
- B. Determine that the above action is an organizational or administrative activity of the government that will not result in direct or indirect physical changes in the environment and is therefore not a project under the California Environmental Quality Act ("CEQA") pursuant to section 15378(b)(5) of the CEQA Guidelines.

**Summary Text:**

The Governance Board of the Manzanita Public Charter School adopted its Conflict of Interest Code amendments on October 5, 2022. The amendments are required to add new positions that must be designated and revise the filing location of statements of economic interests. (See Attachment A—2022 Local Agency Biennial Notice; Attachment B—October 5, 2022, Minutes of the Governance Board; Attachment C—Conflict of Interest Code, Redline Copy; Attachment D—Conflict of Interest Code, Clean Copy.)

**Background:** The Political Reform Act of 1974 requires every local government agency to:

1. Adopt a Conflict of Interest Code identifying the reporting requirements of covered employees,

2. Review the need for any changes to its code biennially, and
3. Submit an amended code to the “code reviewing body” if necessitated by changed circumstances. (Gov. Code, §§ 87300; 87302; 87306.5, subd. (a).)

The Board of Supervisors is designated as the code reviewing body for independent districts and agencies with jurisdictions wholly within the County. (Gov. Code, § 82011, subd. (b).) Once approved by the Board, the Manzanita Public Charter School’s amended Conflict of Interest Code is deemed effective. (Gov. Code, § 87303.)

**Special Instructions:**

Please forward a copy of the minute order reflecting the Board’s action to the Manzanita Public Charter School and Deputy County Counsel Bo Bae.

**Attachments:**

- Attachment A—2022 Local Agency Biennial Notice
- Attachment B—October 5, 2022, Minutes of the Governance Board
- Attachment C—Conflict of Interest Code, Redline Copy
- Attachment D—Conflict of Interest Code, Clean Copy

**Authored by:**

Deputy County Counsel Bo Bae

**cc:**

Manzanita Public Charter School