



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:** March 16, 2021  
**Placement:** Administrative  
**Estimated Tme:** n/a  
**Continued Item:** No  
**If Yes, date from:**  
**Vote Required:** Majority

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**TO:** Board of Supervisors

**FROM:** County Counsel Michael C. Ghizzoni x82950  
Contact Info: Bo L. Bae x82950

**SUBJECT:** 2020 Biennial Review: Amendments to the Conflict of Interest Code of the Los Olivos School District

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**County Counsel Concurrence**

As to form: Yes

**Other Concurrence:**

As to form: n/a

**Auditor-Controller Concurrence**

As to form: n/a

**Recommended Actions:**

That the Board of Supervisors:

- A. Approve the attached, proposed amended Conflict of Interest Code of the Los Olivos School District 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 Board of Education of the Los Olivos School District adopted its Conflict of Interest Code amendments on November 9, 2020. Amendments to the Los Olivos School District's Conflict of Interest Code are required to add language regarding Statements of Economic Interests (Form 700). (See Attachment A—2020 Local Agency Biennial Notice; Attachment B—November 9,

2020 Resolution of the Los Olivos School District; 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 jurisdiction wholly within the County. (Gov. Code § 82011, subd. (b).) Once approved by your Board, the Los Olivos School District’s proposed 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 Los Olivos School District and Deputy County Counsel Bo L. Bae.

**Attachments:**

Attachment A—2020 Local Agency Biennial Notice  
Attachment B—November 9, 2020 Resolution of the Los Olivos School District  
Attachment C—Conflict of Interest Code, Redline Copy  
Attachment D—Conflict of Interest Code, Clean Copy

**Authored by:**

Deputy County Counsel Bo L. Bae

**cc:**

Los Olivos School District