



**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

Submitted on:
(COB Stamp)

Department Name: County Counsel
Department No.: 0710
Agenda Date: August 19, 2025
Placement: Administrative Agenda
Estimated Time: N/A
Continued Item: No
If Yes, date from: N/A
Vote Required: Majority

TO: Board of Supervisors
FROM: Department Director(s): Rachel Van Mullem, County Counsel
Contact: Bo Bae, Senior Deputy County Counsel
SUBJECT: **Proposed Amendments to the Conflict of Interest Code of the Lompoc Unified School District**

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 proposed amendments to the conflict of interest code of the Lompoc Unified School District as submitted; and
- b) Determine that the above-recommended action is not a project that is subject to environmental review under the California Environmental Quality Act (CEQA), pursuant to CEQA Guidelines section 15378(b)(5), finding that the action consists of an administrative activity of the government that will not result in direct or indirect physical changes in the environment.

Summary Text:

The Lompoc Unified School District submits proposed amendments to its conflict of interest code to the Board of Supervisors for approval. Amendments are required to delete the titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions and remove a specific position title that is encompassed by a general title.

Discussion:

The Board of Supervisors is designated as the code reviewing body of the conflict of interest code of any local government agency other than a city agency with jurisdiction wholly within the county.

The Board of Supervisors must take one of the following actions after a local government agency submits its proposed conflict of interest code or amendments to the Board: approve the proposed code as submitted, revise the proposed code and approve of it as revised, or return the proposed code to the local government agency for revision and resubmission within 60 days.

When the Board of Supervisors approves of the local government agency's proposed conflict of interest code or amendments, the proposed code is deemed adopted, and the local government agency must promulgate the code.

Background:

The Political Reform Act of 1974 requires every agency to adopt and promulgate a conflict of interest code setting forth disclosure and disqualification requirements of designated positions, review its code for changes necessitated by changed circumstances biennially, and submit its proposed code or amendments to the code reviewing body. (Gov. Code, § 81000 et seq.)

The Lompoc Unified School District adopted proposed amendments to its conflict of interest code on November 12, 2024.

Special Instructions:

Please send a copy of the minute order to the Lompoc Unified School District and Senior Deputy County Counsel Bo Bae.

Attachments:

Attachment A—2024 Local Agency Biennial Notice

Attachment B—November 12, 2024, Resolution #5089 of the Governing Board

Attachment C—Conflict of Interest Code, Legislative Version

Attachment D—Conflict of Interest Code, Final Version

Contact Information:

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Senior Deputy County Counsel
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cc:

Lompoc Unified School District