



**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: November 4, 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 Santa Barbara County Employees' Retirement System**

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 Santa Barbara County Employees' Retirement System 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 Santa Barbara County Employees' Retirement System submits proposed amendments to its conflict of interest code to the Board of Supervisors for approval. Amendments are required to add new positions that must be designated, delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions, revise based on updates to disclosure categories, revise the titles of existing positions, and make non-substantive updates to clarify terms and the policy review schedule.

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 Santa Barbara County Employees' Retirement System adopted proposed amendments to its conflict of interest code on June 26, 2024, and August 27, 2025.

Special Instructions:

Please send a copy of the minute order to the Santa Barbara County Employees' Retirement System and Senior Deputy County Counsel Bo Bae.

Attachments:

Attachment A—2024 Local Agency Biennial Notice

Attachment B—June 26, 2024, & August 27, 2025, Meeting Minutes of the Board of Retirement

Attachment C—Conflict of Interest Code, Legislative Versions

Attachment D—Conflict of Interest Code, Final Version

Contact Information:

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Senior Deputy County Counsel
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cc:

Santa Barbara County Employees' Retirement System