

## **MEMORANDUM**

**DATE:** September 14, 2012  
**TO:** Oakland Oversight Board  
**RE:** Resolution of the Oakland Oversight Board Adopting a Conflict of Interest Code

### **RECOMMENDATION**

Stein & Lubin LLP recommends that the Oakland Oversight Board approve the attached resolution establishing a Conflict of Interest Code.

### **SUMMARY**

The Political Reform Act of 1974 requires every local government agency to adopt a Conflict of Interest Code and submit it to the appropriate “code reviewing body.” The Oakland City Council is the code reviewing body for the Oversight Board. The Political Reform Act also requires that the local agency review the Code every two years to determine if is accurate, or whether the Code must be amended. State law requires that any and all changes must be submitted to the code reviewing body for approval as an amendment to the Code.

The proposed Oakland Oversight Board Conflict of Interest Code consists of three parts: (1) the list of designated positions/employees deemed to make or participate in governmental decisions within the scope of their job/duties or the jurisdiction of the Oversight Board, and thus required to disclose their financial interests (Appendix A); (2) the specific disclosure requirements (Appendix B); and (3) a copy of the model conflict of interest code promulgated by the Fair Political Practices Commission of the State of California, as set forth in Section 18730 of Title 2 of the California Code of Regulations (Appendix C).