



## **SECTION 1: CONFLICT OF INTEREST CODE – ADOPTED**

The Political Reform Act, Government Code Sections 81000 et. Seq., requires state and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a standard Conflict of Interest Code, which can be incorporated by reference and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 Cal. Code of Reg. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the attached Appendix A in which officials and employees are designated and Appendix B in which disclosure categories are set forth, constitute the Conflict of Interest Code of the City of Santa Clara, which is considered the agency within the purview of this code. The Conflict of Interest Code of the City of Santa Clara so adopted amends and replaces any Conflict of Interest Code of the City of Santa Clara previously in effect to conform to this newly adopted code.

## **SECTION 2: CONFLICT OF INTEREST CODE – STATEMENTS**

Designated employees shall file statements of economic interests with the City of Clerk, who shall be and perform the duties of filing officer for the City of Santa Clara.

## **SECTION 3: SAVINGS CLAUSE**

Any changes provided for in this conflict of interest code shall not affect or excuse any offense or act committed or done or omission or any penalty or forfeiture incurred or accruing under any other conflict of interest code; nor shall it affect any prosecution, suite, or proceeding pending or any judgment rendered in connection with any other conflict of interest code.

**Appendix A:** On file in City Clerk's Office

**Appendix B:** Attached

**APPENDIX A  
CITY OF SANTA CLARA CONFLICT OF INTEREST CODE  
DESIGNATED POSITIONS REQUIRED TO FILE**

<b><u>Governing Bodies/Commissions</u></b>	<b>Disclosure Category</b>
Mayor	1
City Councilmembers	1
Civil Service Commission	1
Cultural Commission	1
Bayshore Project Enhancement Authority	1
Board of Library Trustees	1
Deferred Compensation Committee	1
Housing Authority	1
Housing Rehabilitation Loan Committee	1
Industrial Development Authority	1
Joint Financing Authority	1
Oversight Board for Successor Agency to the City of Santa Clara Redevelopment Agency	1
Planning Commission	1
Public Facilities Financing Corporation	1
Parks and Recreation Commission	1
Salary Setting Commission	1
Sports and Open Space Authority	1
<b><u>City Department</u></b>	
<b>City Attorney's Office</b>	
Assistant City Attorney	1
Chief Assistant City Attorney	1
City Attorney	1
Deputy City Attorney	1
Legal Executive Assistant	1
Risk Manager	1
<b>City Clerk's Office</b>	
Assistant City Clerk	1
City Clerk	1
Deputy City Clerk	1
<b>City Manager's Office</b>	
Assistant City Manager	1
Assistant to the City Manager	1
Chief Operating Officer	1
City Manager	1
Communications & Outreach Manager	1
Deputy City Manager	1
Development Project Manager	1
Director of Economic Development & Sustainability (Deputy City Manager)	1
Executive Assistant to the City Manager	1
Management Analyst	1
Public Information Officer	1

**APPENDIX A  
CITY OF SANTA CLARA CONFLICT OF INTEREST CODE  
DESIGNATED POSITIONS REQUIRED TO FILE**

<b>City Department</b>	<b>Disclosure Category</b>
<b>Community Development</b>	
Assistant Director of Community Development	1
Assistant Planner I	1
Assistant Planner II	1
Associate Planner	1
Building Official	1
Code Enforcement Officer	1
Development Review Officer	1
Director of Community Development	1
Housing Development Officer	1
Inspection Manager	1
Management Analyst	1
Plan Review Manager	1
Planning Manager	1
Principal Planner	1
Senior Planner	1
<b>Finance</b>	
Accounting Division Manager	1
Assistant Director of Finance	1
Budget Manager	1
Budget and Treasury Division Manager	1
Contracts Manager	1
Director of Finance	1
Management Analyst	1
Municipal Services Division Manager	1
Principal Accountant	1
Principal Financial Analyst	1
Senior Management Analyst	1
<b>City Auditor's Office</b>	
Audit Manager	1
City Auditor	1
Management Analyst	1
<b>Fire</b>	
Assistant Fire Marshal	1
Battalion Chief	2
Deputy Fire Chief	1
Deputy Fire Marshall	1
Fire Chief	1
Fire Marshall	1
Fire Protection Engineer	1
Fire Protection Specialist	1

**APPENDIX A  
CITY OF SANTA CLARA CONFLICT OF INTEREST CODE  
DESIGNATED POSITIONS REQUIRED TO FILE**

<b>City Department</b>	<b>Disclosure Category</b>
<b>Human Resources</b>	
Assistant Director of Human Resources	1
Director of Human Resources	1
Human Resources Division Manager	1
Management Analyst	1
<b>Information Technology</b>	
Dir. of Information Technology/Chief Information Officer	1
Information Technology Service Manager	1
Senior Information Technology Services Manager	1
<b>Library</b>	
Assistant City Librarian	1
City Librarian	1
Library Division Manager – Support Services	1
Management Analyst	1
<b>Mayor and Council Office</b>	
Executive Assistant to Mayor and City Council	1
<b>Parks and Recreation</b>	
Cemetery Operations Manager	2
Deputy Parks & Recreation Director	1
Management Analyst	1
Parks & Recreation Director	1
Parks Construction, Maintenance & Repair Manager	4
Recreation Manager	1
<b>Police</b>	
Assistant Police Chief - Sworn	1
Communications Operations Manager	1
Management Analyst – Non-Sworn	1
Police Captain - Sworn	3
Police Chief - Sworn	1
Police Records Manager – Non-Sworn	1
<b>Public Works</b>	
Assistant Director of Public Works /City Engineer	1
Building Maintenance Manager	2
Code Enforcement Officer	1
Code Enforcement Technician	1
Compliance Manager	1
Deputy Public Works Director	1

**APPENDIX A  
CITY OF SANTA CLARA CONFLICT OF INTEREST CODE  
DESIGNATED POSITIONS REQUIRED TO FILE**

<b>Public Works Cont'd</b>	<b>Disclosure Category</b>
Director of Public Works	1
Environmental Programs Manager	1
Fleet Manager	1
Management Analyst	1
Principal Engineer	2
Principal Planner	1
Public Works Inspector	2
Senior Engineer	2
Transportation Manager	2
<b>Water and Sewer</b>	
Assistant Director of Water & Sewer Utilities	1
Compliance Manager	1
Director of Water & Sewer Utilities	1
Management Analyst	1
Principal Engineer – Water and Sewer	1
Senior Administrative Analyst	1
Utility Systems Business Manager	1
Utility Operations Engineer	1
Water and Sewer Operations Manager	1
Water and Sewer Superintendent	1
<b>Silicon Valley Power</b>	
Electric Division Manager	1
Acting Assistant Director of Electric Utility	1
Chief Electric Utility Officer	1
Compliance Manager	1
Electric Division Manager - Engineering	1
Electric Division Manager - Generation	1
Electric Division Manager - Operations	1
Electric Division Manager - Substations	1
Electric Division Manager – Transm Distrib	1
Electric Division Mgr-Mkt A & P	1
Electric Division Manager	1
Electric Program Manager	4
Electric Utility Chief Operating Officer	1
Electric Utility Risk Control Analyst	1
Power System Scheduler/ Trader	1
Power Trader	1
Principal Electric Utility Engineer	1
Principal Power Analyst	1
Principal Utility Information Systems Manager	4
Senior Power System Scheduler/Trader	1
Senior Electric Division Manager	1

**APPENDIX A  
CITY OF SANTA CLARA CONFLICT OF INTEREST CODE  
DESIGNATED POSITIONS REQUIRED TO FILE**

<b>Other</b>	
Consultant/New Positions*	1

As defined in 2 Cal. Code of Regs. Section 18700.3, as may be amended from time to time, "Consultant" means an individual who, pursuant to a contract with a state or local government agency:

(A) Makes a governmental decision whether to:

1. Approve a rate, rule, or regulation;
2. Adopt or enforce a law;
3. Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement;
4. Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract that requires agency approval;
5. Grant agency approval to a contract that requires agency approval and to which the agency is a party, or to the specifications for such a contract;
6. Grant agency approval to a plan, design, report, study, or similar item;
7. Adopt, or grant agency approval of, policies, standards, or guidelines for the agency, or for any subdivision thereof; or

(B) Serves in a staff capacity with the agency and in that capacity participates in making a governmental decision as defined in Regulation 18702.2 or performs the same or substantially all the same duties for the agency that would otherwise be performed by an individual holding a position specified in the agency's Conflict of Interest Code under Government Code Section 87302.

\*Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation: the City Manager may determine in writing that a particular consultant or new position, although a "designated person" is hired to perform a range of duties that are limited in scope and thus is not required to comply with the disclosure requirements described in this section. Such determination shall include a description of the consultant's or new position's duties, and based upon that description, a statement of the extent of disclosure requirements. The City Manager's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code. (Gov. Code Sec. 81008)

**APPENDIX B**  
**MASTER LIST OF DISCLOSURE CATEGORIES**

**Category 1** - All designated employees in this category shall disclose all sources of income, investments, interests in real property, and business positions required to be disclosed of those public officials named in Government Code section 87200.

**Category 2** - All designated employees in this category shall disclose all sources of income, investments and business entities in which the designated employee holds a management position if the business entity engages in land development; construction; the provision of architectural, engineering or other services in connection with construction; the manufacture or sale of electrical, plumbing and other products used in construction; the acquisition or sale of real property or financing of land acquisition, development or construction.

**Category 3** - All designated employees in this category shall disclose all sources of income, investments, and business entities in which the designated employee holds a management position if the business entity is of the type which contracts with the City of Santa Clara to provide services, supplies, materials, machinery or equipment.

**Category 4** - All designated employees in this category shall disclose all sources of income, investments, and business entities in which the designated employee holds a management position if the business entity is of the type which contracts with the designated employee's department.