



# County of Sonoma

## State of California

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Date: June 3, 2025

Item Number: \_\_\_\_\_

Resolution Number: \_\_\_\_\_

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4/5 Vote Required

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### **Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California, Amending the Conflict of Interest Code for the County of Sonoma**

**WHEREAS**, the Political Reform Act, Government Code 8100, et. seq., requires state and local government agencies to adopt conflict of interest codes; and

**WHEREAS**, the County of Sonoma has previously adopted a conflict of interest code; and

**WHEREAS**, state law requires every agency shall amend its conflict of interest code when change is necessitated by changed circumstances, including the creation of new positions which must be designated and relevant changes in the duties assigned to existing positions; and

**WHEREAS**, the County of Sonoma has reviewed its conflict of interest code, and has determined that changes are necessary;

**WHEREAS**, each County Department was requested to review employee designations and disclosure categories pertinent to the Department, and inform the Clerk of the Board and County Counsel of any necessary revisions; and

**WHEREAS**, the Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regulation Section 18730, which contains the terms of a standard conflict of interest code and which can be incorporated by reference and may be amended by the Fair Political Practices Commission after public notice and hearings to conform to amendments to the Political Reform Act, and

**WHEREAS**, the County of Sonoma wishes to amend its conflict of interest code to designate which officers and employees must disclose financial interests and describe which interests must be disclosed; and

**WHEREAS**, County Counsel has reviewed all proposed changes and believes the Code amendments comply with state law;

Now, Therefore, Be It Resolved, the terms of 2 Cal. Code of Regulations 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 and Appendix B, in which disclosure categories are set forth and employees are designated, constitute an amendment to the Conflict of Interest Code of the County of Sonoma, and

**Be It Further Resolved**, pursuant to Section 4 of the standard code, Department Heads shall file statements of economic interest with the Clerk of the Sonoma County Board of Supervisors. Other designated employees shall file statements with their Department's clerk who shall retain them at the main place of business of the department.

**Supervisors:**

Hermosillo:

Rabbitt:

Coursey:

Gore:

Hopkins:

Ayes:

Noes:

Absent:

Abstain:

**So Ordered.**

## APPENDIX A

DISCLOSURE CATEGORIES	FILE SCHEDULES
1. All sources of <b>income*</b> , gifts, <b>investments*</b> and <b>business positions</b> in business entities, and all interests in <b>real property**</b> . (Persons designated to report in this category shall complete all schedules.)	ALL SCHEDULES
2. <b>Investments*</b> and <b>business positions</b> in business entities, gifts* and <b>income*</b> from sources which provide services, supplies, materials, machinery or equipment of the type provided by or utilized by the county.	A1 A2 CE
3. <b>Investments*</b> and <b>business positions</b> in business entities, gifts and <b>income</b> from sources, which provide services, supplies, materials, machinery or equipment of the type utilized by or provided by the employee's department or division.	A1 A2 CE
4. Sources of gifts and <b>income*</b> from, and <b>investments*</b> and <b>business positions</b> in, business entities which are subject to the regulatory, permit or licensing authority of the employee's department.	A1 A2 CE
5. Sources of gifts and <b>income*</b> from, and <b>investments*</b> and <b>business positions</b> in, business entities, which engage in land development, construction or the acquisition or sale of <b>real property**</b> ; and all interests in <b>real property**</b> .	ALL SCHEDULES
6. All sources of gifts and <b>income*</b> from providing mental health or counseling services; and <b>investments*</b> and <b>business positions</b> in business entities which provide mental health or counseling services.	A1 A2 CE
7. <b>Investments*</b> and <b>business positions</b> in business entities and gifts and <b>income*</b> from sources which provide medical services, including but not limited to privately owned hospitals, medical clinics, laboratories, pharmacies and ambulance companies; and  <b>Investments*</b> and <b>business positions</b> in business entities and gifts and <b>income*</b> from sources which manufacture, sell or distribute medical equipment or services of the type leased or loaned by the county to ambulance services, medical services such as police, sheriff and fire rescue units, trauma centers and emergency rooms;  <b>Investments*</b> and <b>business positions</b> in business entities and gifts and <b>income*</b> from sources of the type providing training for persons engaged in medical service programs.	A1 A2 CE
8. Gifts and <b>Income*</b> from individuals who are county employees, or who appear before the Civil Service Commission as an employee's representative.	CE
9. <b>Investments*</b> and <b>business positions</b> in business entities and gifts and <b>income*</b> from sources which provide transportation services subject to the review or approval of the Transportation and Public Works Department and all interests in <b>real property**</b> .  9 (a) <b>Investments</b> , positions in business entities, and gifts and <b>income</b> from wineries, hotels, motels, restaurants, providers of entertainment, and other business entities of the type whose goods or services are used or purchased by tourists or to promote tourism; (b) any <b>investments</b> in, <b>income</b> and gifts from, or <b>business positions</b> in any entity that supplies goods or services to the Sonoma County Tourism Program; and (c) <b>gifts</b> of over \$50 from anyone with an interest in or who receives income from any industry listed in (a) or (b) above.	A1 A2 BC  A1 A2 CD E
10(a) <b>Investments</b> , <b>business positions</b> in business entities, and <b>income</b> from sources which manufacture, sell, or distribute goods or services to the entertainment industry, including the movie industry, television industry, or advertisement industry; (b) any <b>investments</b> in, <b>income</b> from, or <b>business positions</b> in any entity which produces movies, television shows, or advertisements; (c) any <b>investments</b> in, <b>income</b> from, or <b>business positions</b> in any entity that supplies goods or services to the Sonoma County Film Office; and (d) <b>gifts</b> of over \$50 from anyone with an interest in or who receives income from any industry listed in (a), (b), or (c) above.	A1 A2 CD E
11. <b>Investments</b> , <b>business positions</b> in business entities, <b>gifts</b> and <b>income</b> from sources which provide services, supplies, materials, goods or facilities of the type utilized by the Committee, Commission or Board or that receive, are planning to receive, or have received, within the last two years, grants, sponsorships or other monies from the Committee, Commission or Board.	A1 A2 CDE

\* Only investments in and sources of income and gifts from business entities, and sources of income, which do business in Sonoma County, plan to do business in Sonoma County, or have done business in Sonoma County within the past two years should be reported. In addition to other activities, a business entity is doing business within Sonoma County if it owns **real property** within the County.

\*\* Interests in real property which is located in whole or in part within or not more than two miles outside the boundaries of Sonoma County or within two miles of any land owned or used by Sonoma County, or investments in business entities, which buy and sell real property in Sonoma County.

<b><u>CATEGORY</u></b>	<b><u>SCHEDULES</u></b>
Business Positions	A2,C
Commission Income	A2,C
Gifts received by family members	D (Disclosure may not be required)
Gifts received from family members	D (Disclosure not required, see Schedule D)
Income to my business	A2
Individual Retirement Account	A1, B
Investments	A1,A2
Loans made to others	C (Disclosure not required, but report repayments on Schedule C)
Loans received	B, C
Loans to my business	A2 A1,
Owning a business or partnership	A2
Real estate holdings	B (A2 if held by business entity/trust)
Rental income	B, C
Rental property	B (A2 if held by a business entity/trust)
Sale of home/automobile/boat	C
Sole proprietorship	A2
Spouse or registered domestic partner's income	A2,C
Stock holdings	A1, A2
Tickets and passes	D
Travel reimbursements or payments	E
Trusts	A2

**APPENDIX B- Revised June 2025**  
**Auditor-Controller-Treasurer-Tax Collector**

<u>Designated Positions:</u>	<u>Disclosure Category:</u>
Auditor-Controller-Treasurer-Tax Collector	1 (Statutory Filer) *
Assistant Auditor-Controller-Treasurer-Tax Collector	1 (Statutory Filer) **
Investment and Debt Officer	1 (Statutory Filer) **
Treasury Manager	1 (Statutory Filer) **
Treasury Oversight Committee Member and Appointed Alternates	1**
<u>Sonoma County Audit Committee Member</u>	<u>1**</u>
Accounting Manager	3**
Audit Manager	3**
Enterprise Financial Systems Manager	3**
Administrative Services Officer II	3**
Administrative Services Officer I (Disaster Finance Officer)	3**
Consultants	***

\* Original Form 700 filed with FPPC per Government Code §87500(a)(2)(F)

\*\* Form 700 filed with the Auditor-Controller-Treasurer-Tax Collector's Office

\*\*\* Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitations: The department head may determine in writing that a particular consultant, although a "Designated Position" is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the Consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The department head'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.

Appendix B – Revised ~~January 2023~~ **June 2025**  
Department of Child Support Services

**Designated Positions:**

**Disclosure Categories:**

Director	3
Assistant Director	3
Chief Child Support Attorney	3
Child Support Attorney <b>IV</b>	3
Child Support Section Manager	3
Administrative Services Officer I	3
Program Development Manager	3
Department Analyst	3
Consultants	3

Removing the sub category from  
the Child Support Attorney  
position listing to include all Child  
Support Attorney's

## Appendix B - Revised June 2025

### Department of Health Services

**Designated Positions:**

**Disclosure Category:**

Acute Forensics Section Manager	3, 6, 7
Administrative Services Officer II	3, 7
Adult, Youth and Family Services Section Manager	3, 6, 7
Substance Use Disorder and Recovery Services Section Manager	3, 6, 7
Assistant Director of Health Services	1
Business Development Manager	3, 7
Community Mental Health Section Manager	3, 6, 7
Department Administrative Services Director	1
Department Information Systems Manager	3
Deputy Public Health Officer	3, 6, 7
Director of Animal Care and Control	3
Director of Behavioral Health	3, 6, 7
Director of Ending Homelessness Unit	3, 6, 7
Director of Health Services	1
Director of Health Policy, Planning & Evaluation	1
Director of Public Health	3, 6, 7
EMS Coordinator	4, 7
EMS Specialist	4, 7
Environmental Health Program Manager	4
Environmental Health & Safety Section Manager	3, 6, 7
Family Health Section Manager	3, 6, 7
Healthy Communities Section Manager	3, 6, 7
Health Services Division Director, Behavioral Health	3, 6, 7
Health Services Division Director, Public Health	3, 6, 7
Mental Health Medical Director	1
Public Health Laboratory Director	3, 4, 7
Health Officer	1
Regional EMS Manager	3, 4, 7
Senior Department Human Resources Manager	3, 7
Special Projects Director - Project	2, 6, 7
Consultants	**

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The department head may determine in writing that a particular consultant, although a "Designated Position" is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the Consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The department head'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.

**APPENDIX B – *Proposed Amendment June 2025***

**INDEPENDENT OFFICE OF LAW ENFORCEMENT  
REVIEW AND OUTREACH**

<b>Designated Positions</b>	<b>Disclosure Categories</b>
Director, <del>IOLERO</del> ( <i>Removing IOLERO</i> )	1
<b>Chief Deputy Law Enforcement Auditor</b> ( <i>New position added</i> )	1
Law Enforcement Auditor	<b>3</b> <del>1</del> ( <i>category change from 1 to 3</i> )
Department Analyst	<b>3</b> <del>1</del> ( <i>category change from 1 to 3</i> )
Consultants	*

\*Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following:

The Director may determine in writing that a particular consultant, although in a “designated position” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant’s duties and based upon that description, a statement of the extent of the disclosure requirements. The Director’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.



**PUBLIC DEFENDER**

<u>Designated Positions:</u>	<u>Disclosure Category:</u>
Public Defender	3
Administrative Services Officer I	3
Assistant Public Defender	3
Chief Deputy Public Defender	3
Department Analyst	3
Deputy Public Defender	3
Consultants	**

\*\*Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation:

The department head may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The department head'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.

**APPENDIX B- Revised June 2025**  
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Auditor-Controller-Treasurer-Tax Collector	1 (Statutory Filer) *
Assistant Auditor-Controller-Treasurer-Tax Collector	1 (Statutory Filer) **
Investment and Debt Officer	1 (Statutory Filer) **
Treasury Manager	1 (Statutory Filer) **
Treasury Oversight Committee Member and Appointed Alternates	1**
Sonoma County Audit Committee Member	1**
Accounting Manager	3**
Audit Manager	3**
Enterprise Financial Systems Manager	3**
Administrative Services Officer II	3**
Administrative Services Officer I (Disaster Finance Officer)	3**
Consultants	** *

\* Original Form 700 filed with FPPC per Government Code §87500(a)(2)(F)

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Appendix B – Revised June 2025  
Department of Child Support Services

**Designated Positions:**

**Disclosure Categories:**

Director	3
Assistant Director	3
Chief Child Support Attorney	3
Child Support Attorney	3
Child Support Section Manager	3
Administrative Services Officer I	3
Program Development Manager	3
Department Analyst	3
Consultants	3

## Appendix B - Revised June 2025

### Department of Health Services

#### Designated Positions:

#### Disclosure Category:

Acute Forensics Section Manager	3, 6, 7
Administrative Services Officer II	3, 7
Adult, Youth and Family Services Section Manager	3, 6, 7
Substance Use Disorder and Recovery Services Section Manager	3, 6, 7
Assistant Director of Health Services	1
Business Development Manager	3, 7
Community Mental Health Section Manager	3, 6, 7
Department Administrative Services Director	1
Department Information Systems Manager	3
Deputy Public Health Officer	3, 6, 7
Director of Animal Care and Control	3
Director of Behavioral Health	3, 6, 7
Director of Ending Homelessness Unit	3, 6, 7
Director of Health Services	1
Director of Health Policy, Planning & Evaluation	1
Director of Public Health	3, 6, 7
EMS Coordinator	4, 7
EMS Specialist	4, 7
Environmental Health Program Manager	4
Environmental Health & Safety Section Manager	3, 6, 7
Family Health Section Manager	3, 6, 7
Healthy Communities Section Manager	3, 6, 7
Health Services Division Director, Behavioral Health	3, 6, 7
Health Services Division Director, Public Health	3, 6, 7
Mental Health Medical Director	1
Public Health Laboratory Director	3, 4, 7
Health Officer	1
Regional EMS Manager	3, 4, 7
Senior Department Human Resources Manager	3, 7
Special Projects Director - Project	2, 6, 7
Consultants	**

\*\* Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitations:

The department head may determine in writing that a particular consultant, although a "Designated Position" is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the Consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The department head'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.

## APPENDIX B – Adopted June 3, 2025

### INDEPENDENT OFFICE OF LAW ENFORCEMENT REVIEW AND OUTREACH

Designated Positions	Disclosure Categories
Director	1
Chief Deputy Law Enforcement Auditor	1
Law Enforcement Auditor	3
Department Analyst	3
Consultants	*

\*Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following:

The Director may determine in writing that a particular consultant, although in a “designated position” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant’s duties and based upon that description, a statement of the extent of the disclosure requirements. The Director’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.

**PUBLIC DEFENDER**

Designated Positions:

Disclosure Category:

Public Defender	3
Administrative Services Officer I	3
Assistant Public Defender	3
Chief Deputy Public Defender	3
Department Analyst	3
Deputy Public Defender	3
Consultants	**

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The department head may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The department head'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.