



CITY OF ATASCADERO

CITY COUNCIL STAFF REPORT

Item D3

Department: City Clerk
Date: 10/28/25
Placement: Consent

TO: JAMES R. LEWIS, CITY MANAGER
FROM: LARA CHRISTENSEN, CITY CLERK
PREPARED BY: ALYSSA SLATER, DEPUTY CITY CLERK
SUBJECT: Conflict of Interest Code – Biennial Review

RECOMMENDATION:

Council adopt Draft Resolution, updating and amending the Conflict of Interest Code for the City of Atascadero.

DISCUSSION:

The Political Reform Act requires every local government agency to review its Conflict of Interest Code biennially to ensure it remains current and accurately reflects the agency's organizational structure. In addition, Government Code Section 87306 mandates that an agency amend its Conflict of Interest Code whenever changes in circumstances make it necessary to do so. Such changes may include the creation of new positions or titles, the deletion of obsolete ones, or modifications in position responsibilities that affect decision-making authority.

The Conflict of Interest Code is a document that designates the positions within an agency that make, or participate in making, governmental decisions that may foreseeably have a material effect on any financial interest. The Code further sets out, in paragraphs called disclosure categories, the specific types of investments, business positions, interest in real property and sources of income that must be reported by the designated positions.

The Conflict of Interest Code was last updated in July 2022 to reflect amendments to the City's Classification Plan and more detailed disclosure categories. Since the 2022 update, additional approved amendments to the City's Classification Plan have resulted in the addition and reclassification of positions. Following biennial review of the City's current Conflict of Interest Code, it was determined that amendments were necessary to reflect these changes.

This Conflict of Interest Code pertains only to the designated positions listed in Exhibit A to the Draft Resolution. City Council Members, City Treasurer, Planning Commissioners, City Manager, City Attorney are exempt from this Code as they are otherwise required to file disclosure statements pursuant to State Law under Government Code Section 87200. Under Government Code Section 87200, the Administrative Services Director is also exempt from this Code and is required to file directly with the FPPC because this position manages public investments for the City as defined in Government Code Section 18700.3.

The City Clerk and the City Attorney have reviewed the current Code. The proposed amendments to the Conflict of Interest Code incorporate the basic provisions required by Government Code Section 87302 and comply with FPPC regulations. The revised list contains a list of designated positions that make, or participate in making, governmental decisions. Designated positions have been appropriately assigned to suitable disclosure categories that reflect job duties and responsibilities. The recommended changes reflect the current staffing of the City of Atascadero.

ALTERNATIVES TO THE STAFF RECOMMENDATION:

The Code must be updated. The Council is free to add positions to the Code or to suggest any other changes, so long as the changes comply with the Political Reform Act


FISCAL IMPACT:

None.

REVIEWED BY OTHERS:

This item has been reviewed by the City Attorney.

REVIEWED AND APPROVED FOR COUNCIL AGENDA



Lara K. Christensen, Assistant City Manager

ATTACHMENT(S):

1. Draft Resolution
2. Updated Conflict of Interest Code