

July 23, 2025

The Honorable City Council c/o Holly Wolcott, City Clerk 200 North Spring Street City Hall – 3rd Floor Los Angeles, CA 90012

**Re:** New Conflict of Interests Code

**Community Investment for Families Department** 

FOR COUNCIL CONSIDERATION
Action Required by October 21, 2025

#### Dear Councilmembers:

Enclosed is the proposed conflict of interests (COI) code for the Community Investment for Families Department (CIFD). As the City's code-reviewing body, the City Council must approve, revise, or return the proposed amendments within 90 days of the date they are received. Cal. Gov't Code §§ 82011(c), 87303. We recommend that you approve the COI code, which is provided in Attachments A through C.

#### A. Background

State law requires every City agency to adopt a COI code to help officials in the agency avoid financial conflicts of interest. Each COI code must identify the positions in the agency that have the authority to make or participate in government decisions, as well as the financial interests that must be reported on California Form 700 by the individuals who occupy those positions. Cal. Gov't Code §§ 87300, 87302(a). Agencies are required to amend their COI codes when changed circumstances make amendments necessary. Cal. Gov't Code § 87306.

#### B. Elements of a COI Code

A COI code consists of three sections: the incorporation and certification, a list of designated positions (schedule A), and a list of disclosure categories (schedule B). 2 Cal. Code Regs. §§ 18730(a)–18730(b)(3).

The incorporation and certification is a standardized introductory statement that briefly explains the function of the COI code, provides references to relevant sections of the California Political Reform Act and its regulations, and certifies that the entire COI code was approved by the City Council. The incorporation and certification is included in each agency's COI code.

Schedule A is a list of specific positions in the agency that have the authority to make or participate in making decisions that could foreseeably have an effect on a personal financial

interest. Each position is assigned to a disclosure category, which is found in Schedule B. The disclosure category is based on the position's type and level of decision-making authority and describes the types of investments, business positions, sources of income, and interests in real property that must be reported on a statement of economic interests (California Form 700).

#### C. Process

As a newer City department, CIFD has not previously adopted a COI code. In an effort to comply with state law, the agency has developed a COI code in consultation with the Ethics Commission. CIFD's staff conducted a substantive review, and the newly created code reflects the agency's current organizational structure and decision-making processes.

On October, 2, 2024, a notice of intention to adopt CIFD's COI code was emailed to the staff and the unions that represent them. The notice was also posted on the public bulletin boards in City Hall and City Hall East. A 30-day public comment period began that day and ended on November 1, 2024. During the comment period, a public hearing was not requested and no written comments were received.

On March 3, 2025, a second notice of intention to adopt CIFD's COI code was emailed to the staff and the unions that represent them. The notice was also posted on the public bulletin boards in City Hall and City Hall East. A 30-day public comment period began that day and ended on April 2, 2025. During the comment period, a public hearing was not requested and no written comments were received.

On May 20, 2025, the CIFD General Manager, Abigail Marquez, approved CIFD's proposed COI code, confirming that the Schedule A list of designated positions identifies all individuals in CIFD who are required by state law to file statements of economic interests and that the assigned disclosure categories accurately reflect the scope of each position's decision-making authority. Copies of the proposed schedules are provided in Attachments A and B.

#### D. Conclusion

On behalf of CIFD, we urge you to approve its COI code, which is provided in Attachments A, B, and C. Under state law, City Council action on the code is required by *October 21, 2025* (90 days after this transmittal is received).

If you have any questions, please contact Ethics Program Manager Samantha Rodriguez at (213) 978-1960.

Sincerely,

David Tristan
Executive Director

web list

#### Attachments:

- A Proposed Schedule A Designated Positions
- *B* Proposed Schedule B Disclosure Categories
- C Incorporation and Certification

cc: Assistant City Attorney Renee Stadel

### City of Los Angeles

### **Community Investment for Families Department**

# Conflict of Interests Code DESIGNATED POSITIONS (Schedule A)

Position Title	<b>Disclosure Category</b>
Assistant Chief Grants Administrator	8
Assistant General Manager	1
Chief Management Analyst	1
Consultant	**
Departmental Chief Accountant	1
Environmental Supervisor	5
Fiscal Systems Specialist	8
General Manager	1
Internal Auditor	8
Member, Commission on Community & Family Service	es 1
Payroll Supervisor	4
Principal Accountant	8
Programmer Analyst	8
Public Information Director	1
Senior Accountant	8
Senior Auditor	8
Senior Management Analyst	8
Senior Project Coordinator	5
Senior Systems Analyst	8

- \* Government Code Section 87200 requires that all filers in this classification disclose all investments, income, and interests in real property.
- \*\* 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 General Manager 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 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 General Manager's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interests code. (Gov. Code Section 81008.)

#### City of Los Angeles

#### COMMUNITY INVESTMENT FOR FAMILIES DEPARTMENT

Conflict of Interests Code

### DISCLOSURE CATEGORIES (Schedule B)

An individual whose position is identified in the Designated Positions section (Schedule A) of an agency's conflict of interests code is a filer and must disclose each economic interest identified below for the disclosure category associated with the individual's position. Disclosure must be made by filing the California Form 700 on specified schedules.

The definitions for investments, business positions, sources of income, interests in real property, doing business, gifts, and other terms may be found in the California Political Reform Act, its associated regulations, and the instructions for the California Form 700. The term "division" means a subset of the filer's agency and, depending on the agency's structure, may also be known as a department, group, office, section, or other similar term used to indicate a subordinate unit of the agency.

Economic interests must be disclosed for the applicable reporting period. In general, the following types of Form 700 filings have the following reporting periods:

Annual: January 1 through December 31 of the previous calendar year.

Assuming Office: the date the filer assumes office for investments, business

positions, and interests in real property; for income, the 12 months immediately preceding the date the filer assumes office.

Leaving Office: the last date covered by the filer's most recent filing through the

date the filer left the designated position.

Reporting periods may vary in individual circumstances and for other types of filings and should be verified with the Ethics Commission.

#### Category 1

Any investment, business position, source of income, or interest in real property.

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's agency;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's agency; or

- 3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- C. Any investment in, business position with, or income from a source that did any of the following:
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#### Category 12

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#### Category 16

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- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
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## COMMUNITY INVESTMENT FOR FAMILIES DEPARTMENT CITY OF LOS ANGELES

CONFLICT OF INTERESTS CO	ODE	Effective Date:	
Incorporation and Certification Page 1 of 2	Council File No		_

#### INCORPORATION

The Political Reform Act of 1974 (PRA) requires state and local government agencies to adopt and promulgate conflict of interests codes to help government employees avoid financial conflicts. See California Government Code sections 81000 et seq.

The Fair Political Practices Commission (FPPC) has adopted a regulation that contains the terms of a standard conflict of interests code, can be incorporated by reference, and may be amended by the FPPC to conform to amendments to the PRA after public notice and hearings. This agency's conflict of interests code incorporates by reference that regulation (2 California Code of Regulations section 18730); the attached Schedule A, which identifies each position in the agency that is charged with making or participating in making a government decision; and the attached Schedule B, which identifies the economic interests that the individuals in those designated positions must disclose.

City officials (individuals holding, elected to, or appointed to a position in Schedule A) must periodically submit statements of economic interests that disclose the economic interests in Schedule B that they held during the reporting period. The statements must be submitted to the Ethics Commission, which makes the statements available for public inspection and reproduction (see California Government Code section 81008).

City officials are required to comply with the requirements of their agency's code and the requirements of state and City law.

July 23, 2025

# COMMUNITY INVESTMENT FOR FAMILIES DEPARTMENT CITY OF LOS ANGELES

CONFLICT OF INTERESTS CODE	Effective Date:		
Incorporation and Certification Cou Page 2 of 2	uncii fiie no		
CERTIFICATION			
participate in the making of governments assigned to each position accurately report their investments, business possurces of income that could foresee	tes all positions in the agency that make or nental decisions. The disclosure category requires individuals who hold the position to ositions, interests in real property, and eably be materially affected by the City making. This code was approved by the rerning board or commission on		
May 20, 2025 (Date)	(Signature)  General Manager  (Title)  5/20/2025		
	(Date)		