

## CONFLICT OF INTEREST CODE

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Sonoma County Employees' Retirement Association

I. The terms of 2 Cal. Code of Regs. Section 18730 (the standard code) 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, Appendix B, and Appendix C in which trustees, employees and consultants are designated and disclosure categories are set forth, constitute the Sonoma County Employees' Retirement Association (SCERA) Conflict of Interest Code (Code), and

II. Pursuant to Section 4 of the standard code, designated employees shall file statements of economic interest with the SCERA Retirement Chief Executive Officer. Any SCERA trustees, employees or consultants already required to file a disclosure statement (Form 700) pursuant to Government Code Section 87200, et seq. are identified in Appendix C and no additional disclosure is required by this Code. Officials designated in Appendix C shall file their original disclosure statements with the SCERA Retirement Chief Executive Officer, who shall make and retain a copy, and forward the original to the Fair Political Practices Commission or to the appropriate agency pursuant to 2 Cal. Code of Regs. Section 18753(d) at the discretion of the Fair Political Practices Commission.

### III. REVIEW

The Conflict of Interest Code shall be reviewed every two (2) years as required by Government Code Section 87306.5 and any amendments will be submitted to the Sonoma County Board of Supervisors as the Code reviewing body.

### IV. HISTORY

The Board of Retirement adopted the Fair Political Practices Commission Conflict of Interest Code (Code) pursuant to 2 Cal. Code of Regs. Section 18730 on February 15, 2001, Retirement Board Resolution 44. Government Code Section 87306.5 requires agencies review the Code and submit any revisions to the Code reviewing body, which, for SCERA, is the Sonoma County Board of Supervisors. SCERA received approval of the Code on February 27, 2001, Board of Supervisors Resolution 01-230e.

The Code was reviewed on August 19, 2004 and July 20, 2006.

The Code was amended on September 18, 2008 to include Retirement Investment Officer, Retirement Accounting Manager and Department Information Systems Coordinator.

The Code was reviewed on January 20, 2011.

The Code was amended on March 15, 2012 to include Appendix C.

The Code was amended on August 16, 2012 to incorporate the effect of Government Code Sections 87302 and 87314 and the resultant Appendix C, to delete positions identified in Appendix C as being required to file Form 700 disclosures as Agency Positions that Manage Public Investments for Purposes of Section 87200 of the Government Code and to add Senior Retirement Investment Officer, Retirement Investment Analyst and Consultants to Appendix C.

The Code was amended on February 21, 2013 to recognize the discretion of the Fair Political Practices Commission to direct the appropriate agency for filing under 2 Cal. Code of Regs. Section 18753(d).

The Code was reviewed on January 16, 2014.

The Code was amended on January 28, 2016 to add Chief Retirement Counsel to Appendix C.

The Code was amended on June 30, 2016 to add Chief Retirement Investment Officer to Appendix C.

The Code was amended on November 17, 2016 to include Retirement Benefits Services Manager.

The Code was amended February 22, 2018 to reflect the renamed positions Retirement Chief Executive Officer and Retirement Assistant Chief Executive Officer in Appendix C.

The Code was amended on January 16, 2020 to substitute, in two places, “Chief Executive Officer” for the prior name for the same position, “Administrator”, and to remove the unfilled positions of Department Information Systems Manager, Retirement Investment Officer, Retirement Investment Analyst, and Chief Retirement Counsel in Appendix C.

The Code was reviewed on June 16, 2021 and clerical amendments were made to add the new SCERA logo, create a history and review section, and elevate the footnoted text relating to Code amendments to the review section.

The Code was amended on November 8, 2022 to change the name of the Retirement Assistant Chief Executive Officer to Assistant Chief Executive Officer/Chief Legal Counsel, and to add Retirement Investment Officer in Appendix C.

The Code was reviewed on September 19, 2024.

**APPENDIX A**

<b>Designated Positions</b>	<b>Disclosure Categories</b>
Retirement Accounting Manager	1, 2, 3, 4
Retirement Benefits Services Manager	1, 2, 3, 4

## APPENDIX B

### DESCRIPTION OF FINANCIAL DISCLOSURE CATEGORIES<sup>1</sup>

**Category 1: Investments** in any business, entity, or real estate venture of the type in which the Retirement Board is legally authorized to invest, or in any type of entity that provides services or supplies of the type used by the Retirement Office (currently Schedules A-1 &/or A-2 of Form 700).

**Category 2: Interests in Real Property** that could be affected by any decision made or participated in by the designated individual (currently Schedules B &/or C of Form 700). If the designated individual is a trustee or SCERA employee, disclosure is only required on real property located in the County of Sonoma.

**Category 3: Income** from any source of the type in which the Retirement Board is legally authorized to invest, or from any person or entity that provides services or supplies of the type used by the Retirement Office (currently Schedules C, D, E, &/or F of Form 700).

**Category 4: Any Position Held** as a director, officer, partner, trustee, or any position of management in any business entity that offers or holds investments of the type in which the Retirement Board is legally authorized to invest, or in any type of entity that provides services or supplies of the type used by the Retirement Office (currently Schedule C of Form 700).

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<sup>1</sup> Only investments in and sources of income from business entities, and sources of income, which do business in the geographic area of SCERA, or real property interests located in the County of Sonoma need to be reported.

## **APPENDIX C**

### **AGENCY POSITIONS THAT MANAGE PUBLIC INVESTMENTS FOR PURPOSES OF SECTION 87200 OF THE GOVERNMENT CODE.**

Trustees

Retirement Chief Executive Officer

Retirement Assistant Chief Executive Officer/Chief Legal Counsel

Chief Retirement Investment Officer

Senior Retirement Investment Officer

Retirement Investment Officer

Consultants