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**BRENT P. COLLINSON, ATTORNEY AT LAW**

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**DATE:** 6/17/2015  
**TO:** BOARD OF DIRECTORS  
**FROM:** BRENT P. COLLINSON  
**RE:** REVISIONS TO CONFLICT OF INTEREST CODE

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Dear Board—One of the items on this month's Agenda relates to the adoption of a revised Conflict of Interest Code.

As background, each public agency must have a Conflict of Interest Code and review it by July 1 of each even numbered year. The District did so and adopted the revised code on February 19, 2014 as Policy Instruction 204. It had been sent to the FPPC for review and comment and no comments were received prior to February 19.

However, after our revised Code was adopted, the FPPC contacted the District and asked that non-substantive changes be made to our Code, to comply with new language they had adopted as their standard form.

Accordingly, we are now moving forward with making the requested changes; again, there are no substantive changes but merely rewording to comply with the FPPC's new standard language.

We have again provided them notice of the proposed Code. Their regulations also require giving notice to the public and affected employees and consultants. This can be done by conducting a public hearing or establishing a written comment period. In order to be as transparent as possible, we have done both, including publishing "fair notice" in the *Sierra Sun* and also holding a public hearing (scheduled for the June 24 Board Meeting).

Therefore, at that meeting, we will "open the public hearing" which will allow for public comment. After public comment has been completed, we will then close the public hearing. This is the same procedure as any agenda item other than holding the public hearing. The Board can then proceed with adopting the proposed/revised Code.

Please let me know of any questions or comments prior to or at the June 24 meeting.

BPC

