

## Memorandum

**TO:** Administration and Finance Committee  
Board of Directors

**FROM:** Julie A. Sherman, Legal Counsel

**DATE:** March 27, 2026

**RE: Amending Conflict of Interest Code**

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### ACTION

It is recommended that the Board of Directors adopt the attached revised Conflict of Interest Code and Appendices.

### SIGNIFICANCE

California Government Code Section 87306.5 requires every local agency to review its Conflict of Interest Code in each even-numbered year and to amend the Code if necessitated by changed circumstances.

Accordingly, we have updated the designated positions to reflect the agency's reorganization that occurred after the last review of the Code. Specifically, the following positions have been added: Director of ADA & Specialized Services, Director of Maintenance, Facilities Superintendent, Manager of Human Resources, Manager of Maintenance, and Manager of Training. The following positions have been removed: Director of Innovation and Mobility, Director of Recruitment & Employee Development/DBE Officer, and Manager of Customer Service & Public Outreach. Additionally, the following positions have been reclassified and the titles have been updated: Manager of Purchasing & Grants (from Manager of Facilities & Grants) and Manager of Marketing & Communications (from Manager of Marketing & Customer Service).

### ATTACHMENTS

For reference, the following documents are attached:

1. The proposed Conflict of Interest Code, including the revised Appendices of Designated Positions and Disclosure Categories; and
2. Resolution No. 2026-27 to adopt the amended Conflict of Interest Code.

## **CONFLICT OF INTEREST CODE**

### **CENTRAL CONTRA COSTA TRANSIT AUTHORITY**

Adopted on February 19, 1981 pursuant to Resolution No. 1981-001

Amended on July 16, 1988 pursuant to Resolution No. 1988-043

Amended on September 15, 1994 pursuant to Resolution No. 1995-008

Amended on September 19, 1996 pursuant to Resolution No. 1997-001

Amended on September 17, 1998 pursuant to Resolution No. 1999-02

Amended on September 21, 2000 pursuant to Resolution No. 2001-007

Amended on September 19, 2002 pursuant to Resolution No. 2003-007

Amended on September 16, 2004 pursuant to Resolution No. 2005-003

Amended on September 21, 2006 pursuant to Resolution No. 2007-009

Amended on August 21, 2008 pursuant to Resolution No. 2009-004

Amended on September 16, 2010 pursuant to Resolution No. 2011-003

Amended on September 16, 2012 pursuant to Resolution No. 2013-003

Amended on December 18, 2014 pursuant to Resolution No. 2015-016

Amended on February 15, 2018 pursuant to Resolution No. 2018-010

Amended on June 18, 2026 pursuant to Resolution No. 2026-27

## **CONFLICT OF INTEREST CODE FOR THE CENTRAL CONTRA COSTA TRANSIT AUTHORITY**

The Political Reform Act of 1974 (Government Code Sections 81000, *et seq.*) requires State and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730), which contains the terms of a standard Conflict of Interest Code and can be incorporated by reference into an agency's code.

Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission, along with the attached Appendices, designating positions and establishing disclosure categories, shall constitute the Conflict of Interest Code of the Central Contra Costa Transit Authority (County Connection).

Individuals holding designated positions shall file their statements of economic interests with County Connection, which will make the statements available for public inspection and reproduction. (Gov. Code Sec. 81008.) County Connection will retain a copy of each statement and forward the originals to the Contra Costa County Board of Supervisors, which shall be the filing officer.

## APPENDIX A

### DESIGNATED POSITIONS

<u>Designated Positions</u>	<u>Disclosure Category(ies)</u>
Assistant General Manager of Administration	1, 2, 3
Chief Operating Officer & Safety/EOC	1, 2, 3
Director of ADA & Specialized Services	2, 3
Director of Human Resources	2, 3
Director of IT	2, 3
Director of Maintenance	2, 3
Director of Planning and Marketing	2, 3
Director of Transportation	2, 3
Facilities Superintendent	2, 3
Manager of Accounting	2, 3
Manager of Accessible Services	2, 3
Manager of Purchasing & Grants	2, 3
Manager of Human Resources	2, 3
Manager of Maintenance	2, 3
Manager of Marketing & Communications	2, 3
Manager of Planning	2, 3
Manager of Training	2, 3
Manager of Transportation	2, 3
Buyer	2, 3
Legal Counsel	1, 2, 3
Consultants/New Positions	*

\*Pursuant to Title 2, Division 6, California Code of Regulations, Section 18734, Consultants/New Positions that make or participate in the making of decisions that may foreseeably have a material effect on any financial interest are included in the list of designated positions and shall disclose

pursuant to the broadest disclosure category in the Conflict of Interest Code, subject to the following limitation:

The General Manager may determine in writing that a particular consultant or a new position, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus not required to comply with the disclosure requirements described in this section. Such determination shall include a description of the consultant's or a new position's duties, and, based upon that description, a statement of the extent of disclosure requirements. The determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code. (Gov. Code Section 81008.) Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

### **Officials Who Manage Public Investments**

The positions listed below are NOT covered by the Conflict of Interest Code because they must file a statement of economic interests pursuant to Government Code Section 87200 and, therefore, are listed for information purposes only:

Members of the County Connection Board of Directors  
Alternate Members of the County Connection Board of Directors  
Chief Financial Officer  
General Manager

An individual holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe their position has been categorized incorrectly. The Fair Political Practices Commission makes the determination whether a position is covered by Section 87200.

## **APPENDIX B**

### **DISCLOSURE CATEGORIES**

**Category 1:** Interests in real property located within or not more than two miles outside the boundaries of the jurisdiction of or within a two mile radius of any land owned or used by County Connection.

**Category 2:** Investments and business positions in business entities, and income, including receipt of gifts, loans, and travel payments, from sources that provide products, services, supplies, materials, machinery, or equipment of the type utilized by County Connection or in projects funded by County Connection, including buses, insurance, information technology, telecommunications, public utilities, consultants, transportation companies, and manufacturers.

**Category 3:** Investments and business positions in business entities, and income, including receipt of gifts, loans, and travel payments, from, sources that filed a claim with or against County Connection during the previous two years, or have a claim pending with or against County Connection.

**RESOLUTION NO. 2026-27**

**BOARD OF DIRECTORS, CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
STATE OF CALIFORNIA**

\* \* \*

**ADOPTING AMENDED CONFLICT OF INTEREST CODE**

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 *et seq.*, for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions and certain unincorporated portions of Contra Costa County;

WHEREAS, pursuant to Resolution No. 1981-001, dated February 19, 1981, CCCTA adopted a Conflict of Interest Code ("Code") as required by the Political Reform Act of 1974;

WHEREAS, California Government Code Section 87306.5 requires that CCCTA review its Conflict of Interest Code every even-numbered year, and revise it if necessary;

WHEREAS, Legal Counsel and staff have reviewed the current Conflict of Interest Code and have determined that the Code and its Appendices should be updated to reflect current staffing positions and organization; and

WHEREAS, Legal Counsel, the Administration & Finance Committee, and staff recommend adopting the amended Conflict of Interest Code.

NOW, THEREFORE, BE IT RESOLVED by the Central Contra Costa Transit Authority Board of Directors that the amended Conflict of Interest Code is hereby adopted, in the form presented to the Board of Directors; and

BE IT FURTHER RESOLVED that the Board Clerk is directed to transmit a copy of the amended Conflict of Interest Code to the Board of Supervisors of Contra Costa County for its review and approval, and to make any revisions that may be required by the County for approval of the Code.

Regularly passed and adopted this 16th day of April 2026, by the following vote.

AYES:

NOES:

ABSTAIN:

ABSENT:

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Robert Storer, Chair, Board of Directors

ATTEST:

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Lathina Hill, Clerk to the Board