



# CITY OF SAN MATEO

City Hall  
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[www.cityofsanmateo.org](http://www.cityofsanmateo.org)

## Agenda Report

Agenda Number: 4

Section Name: {{section.name}}

Account Number: 10-1511

File ID: {{item.tracking\_number}}

**TO:** City Council  
**FROM:** Alex Khojikian, City Manager  
**PREPARED BY:** City Clerk's Office  
**MEETING DATE:** September 16, 2024  
**SUBJECT:**  
City of San Mateo Conflict of Interest Code – 2024 Biennial Update

### RECOMMENDATION:

Adopt a Resolution to update the City of San Mateo's conflict of interest code to account for the addition, deletion, and modification of positions listed as "designated employees."

### BACKGROUND:

The Political Reform Act of 1974 requires, among other things, that local government agencies adopt and maintain a conflict of interest code. Like most cities, the City of San Mateo many years ago adopted a "model" conflict of interest code prepared by the Fair Political Practices Commission. The model code establishes the substantive requirements relating to the disclosure of financial interests and the requirements for disqualification from participation in decisions in which City employees and other officials might have a private, financial interest. Cities adopting the model code need only adopt a list designating those employees subject to the conflict of interest code's financial interest disclosure requirements and specifying the scope of interests those designated employees must disclose.

In addition to imposing the requirement to adopt a local code including the listing of designated employees, the Political Reform Act requires cities to review their codes on at least a biennial basis (to be conducted each even numbered year) to ensure that the code reflects the organization's current staffing.

A review of the City of San Mateo's conflict of interest code revealed that revisions were required due to the addition of positions not previously listed, and the deletion of positions that have been eliminated or which do not meet the decision-making threshold to necessitate the need to file. The exhibit attached to the resolution included with this report reflects these changes.

The list of designated employees and officials does not include council members, planning commissioners, the city manager, the city attorney, and the finance director. These positions are not listed in the local code because they are already required by state law to disclose their financial interests.

### BUDGET IMPACT:

There is no budget impact with this item.

### ENVIRONMENTAL DETERMINATION:

This item is not a project subject to CEQA, because it is an organizational or administrative activity that will not result in direct or indirect physical changes to the environment. (CEQA Guidelines Section 15378(b)(5).)

**NOTICE PROVIDED**

All meeting noticing requirements were met.

**ATTACHMENTS**

Att 1 - Proposed Resolution

Att 2 - Conflict of Interest Code Track Changes Post 2022 Biennial Review to Current 2024 Biennial Review

**STAFF CONTACT**

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