

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 ••• 1100 K STREET BUILDING, SACRAMENTO, 95814

September 28, 1976

Mr. Robert W. Kelly
Deputy City Attorney
City of San Bernardino
300 North "D" Street
San Bernardino, California 92418

76-247

Dear Mr. Kelly:

Thank you for your letter of September 1, 1976, inquiring about the development of Conflict of Interest Codes for city agencies and the appropriate Code reviewing body for the "Civic Center Authority".

A package of materials outlining various model Codes and instructions for developing Conflict of Interest Codes will be mailed to you shortly, including materials explaining recent Commission actions regarding development of Conflict of Interest Codes.

The Commission has not undertaken any projects toward developing specific Codes for various City departments; however, the methods of categorizing various designated employees will be set forth in each of the model Codes transmitted in the package of materials your City will soon be receiving.

You ask, in addition, who is the Code reviewing body for the Civic Center Authority, which is created and administered by a joint powers agreement between the City of San Bernardino, the Redevelopment Agency of the City of San Bernardino, and the County of San Bernardino.

Government Code §82011 provides:

82011. "Code reviewing body" means:

....

(b) The Board of Supervisors, with respect to the Conflict of Interest Code of any county agency other than the Board of Supervisors, and of any local government agency, other than a city agency, with jurisdiction wholly within the county;

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Based upon this portion of the Government Code, it is clear that the Conflict of Interest Code of the San Bernardino Civic Center Authority will be reviewed by the Board of Supervisors.

If I may be of further assistance to you in any regard, please feel free to call me at 916/322-6444.

Sincerely,

Delbert L. Spurlock, Jr., Chief
Conflicts of Interest Division

DLS:gb



CITY OF SAN BERNARDINO

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SEP 10 9

300 NORTH "D" STREET, SAN BERNARDINO, CALIFORNIA 92418

76247

RALPH H. PRINCE
CITY ATTORNEY

September 1, 1976

11.54

Fair Political Practices Commission
926 "J" Street, Suite 522
Sacramento, California 95814

Re: Conflict of Interest Code

Gentlemen:

It would be appreciated if you would forward proposed Conflict of Interest Codes for various city departments. We are especially interested in methods of categorizing the various "designated employees".

Additionally, the City of San Bernardino, the Redevelopment Agency of the City of San Bernardino and the County of San Bernardino have entered into a joint powers agreement creating the San Bernardino Civic Center Authority. That body has acquired, constructed and leased public buildings. Who is the Code Reviewing Body for the Civic Center Authority?

Very truly yours,

ROBERT W. KELLY
Deputy City Attorney

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