



Campaign Finance and Ethics Commission

AGENDA STAFF REPORT

MEETING DATE: July 27, 2026

Agenda Item: Three

SUBJECT: Biennial Review of Conflict of Interest Code

RECOMMENDED ACTION: Make no changes to the Conflict of Interest Code.

Background:

The Political Reform Act requires every local government agency to review its conflict of interest code biennially. A conflict of interest code tells public officials, governmental employees, and consultants what financial interests they must disclose on their Statement of Economic Interests (Form 700).

Attached as Exhibit A is the FPPC Biennial Notice for Local Agencies related to the Conflict of Interest Code. This document provides the five (5) questions to ask in determining whether a Conflict of Interest Code needs to be amended. The answers to each question for the Office and the Commission are negative thus we recommend no changes to the Code in 2026.

Attached as Exhibit B is the current disclosure category for each position related to the Office and Commission.

Attached as Exhibit C are the standard disclosure categories used by the County.

FAIR POLITICAL PRACTICES COMMISSION

2026 Conflict of Interest Code Biennial Notice Instructions for Local Agencies

The Political Reform Act requires every local government agency to review its conflict of interest code biennially. A conflict of interest code tells public officials, governmental employees, and consultants what financial interests they must disclose on their Statement of Economic Interests (Form 700).

By **July 1, 2026**: The code reviewing body must notify agencies and special districts within its jurisdiction to review their conflict of interest codes.

By **October 1, 2026**: The biennial notice must be filed with the agency's code reviewing body.

The FPPC has prepared a 2026 Local Agency Biennial Notice form for local agencies to complete or send to agencies within its jurisdiction to complete before submitting to the code reviewing body. The City Council is the code reviewing body for city agencies. The County Board of Supervisors is the code reviewing body for county agencies and any other local government agency whose jurisdiction is determined to be solely within the county (e.g., school districts, including certain charter schools). The FPPC is the code reviewing body for any agency with jurisdiction in **more than one county** and will contact them.

The Local Agency Biennial Notice is not forwarded to the FPPC.

If amendments to an agency's conflict of interest code are necessary, the amended code must be forwarded to the code reviewing body for approval within 90 days. An agency's amended code is not effective until it has been approved by the code reviewing body.

If you answer yes, to any of the questions below, your agency's code probably needs to be amended.

- Is the current code more than five years old?
- Have there been any substantial changes to the agency's organizational structure since the last code was approved?
- Have any positions been eliminated or re-named since the last code was approved?
- Have any new positions been added since the last code was approved?
- Have there been any substantial changes in duties or responsibilities for any positions since the last code was approved?

If you have any questions or are still not sure if you should amend your agency's conflict of interest code, please contact the FPPC. Additional information including an online webinar regarding how to amend a conflict of interest code is available on [FPPC's website](https://www.fppc.ca.gov).

Campaign Finance and Ethics Commission						
Last Name	First Name	Middle Name	Title		Appointed	District
Hoard	Denah		Executive Director	OC-01	4/10/2017	
Karkia	Reza		Commissioner	OC-33	6/27/2023	District 1
Brown	Judson		Commissioner	OC-33	5/7/2024	District 2
Halle	William		Commissioner	OC-33	4/25/2022	District 3
Miller	Franz		Commissioner	OC-33	9/29/2020	District 4
Lawson	James		Commissioner	OC-33	10/14/2025	District 5



**ORANGE COUNTY CONFLICT OF INTEREST
STANDARD DISCLOSURE CATEGORIES**
(**Updated 4-14-26**)

No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-01	All interests in real property in Orange County, the authority or the District as applicable, as well as investments, business positions and sources of income (including gifts, loans and travel payments).	Full disclosure	Department Head, Supervisor, Board Member , Executive Staff, Attorneys, Superintendent, General Manager, etc.
OC-02	All investments, business positions and sources of income (including gifts, loans and travel payments).	Full disclosure excluding interests in real property	
OC-03	All interests in real property in Orange County, the Authority or the District as applicable.	Interests in real property	Appraisers, real estate negotiators
OC-04	All interests in real property within a 10-mile radius of John Wayne Airport.	Limited interests in real property	JWA specialty
OC-05	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide services, supplies, materials, machinery, equipment (including training and consulting services) used by the County Department, Authority or District, as applicable.	Department general purchasing	Purchasing agents
OC-06	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide leased facilities and goods, supplies, equipment, vehicles, machinery or services (including training and consulting services) of the types used by the County Department, Authority or District, as applicable.	General purchasing for department	Purchasing agents, Appraisers,
OC-07	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide accounting, auditing, bookkeeping, tax preparation, tax consulting work/services, or auditors.	Specific purchasing for department	Appraisers, purchasing agents
OC-08	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that develop or provide computer hardware/software, voice data communications, or data processing goods, supplies, equipment, or services (including training and consulting	Specific purchasing for department	Purchasing Agents, IT staff
OC-09	All interests in real property in Orange County, the Authority or the District, as applicable, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources owning property in Orange County, the Authority or District.		Appraisers
OC-10	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that are engaged in any real estate activity including, but not limited to real estate appraisal, development, construction, planning/architectural design, engineering, sales, brokerage, leasing, lending, insurance, rights of way, and/or studies; and/or property or facilities management/maintenance/custodial and utility services as used by the County Department, Authority or District or provides capital for the purchase of property used or sold by Orange County, the Authority or the District as applicable.		Appraisers, real estate negotiators, engineers, etc.



**ORANGE COUNTY CONFLICT OF INTEREST
STANDARD DISCLOSURE CATEGORIES**
(**Updated 4-14-26**)

No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-11	All interests in real property in Orange County or located entirely or partly within the Authority or District boundaries as applicable, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that are engaged in the supply of equipment related to recruitment, employment search & marketing, classification, training, or negotiation with personnel; employee benefits, and health and welfare benefits.		HR specialty
OC-12	All interests in real property in Orange County, the District, or Authority, as applicable, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that invest funds or engage in the business of insurance including, but not limited to insurance companies, carriers, holding companies, underwriters, brokers, solicitors, agents, adjusters, claims managers and actuaries; from financial institutions including but not limited to, banks, savings & loan associations and credit unions or sources that have filed a claim, or have a claim pending, against Orange County, the Authority or the District, as applicable.		Financial consultants; attorneys; claims administrators; public finance analysts
OC-13	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that produce or provide promotional items for public outreach programs; present, facilitate, market or otherwise act as agent for media relations with regard to public relations; provide printing, copying, or mail services; or provide training for or development of customer service representatives.		Public outreach managers, consultants
OC-14	All interests in real property in Orange County as well as all investments in, business positions with and income (including gifts, loans and travel payments) from sources that offer or provide sober living residential facilities within the jurisdiction of the County Department or from sources that offer or provide wholesale or retail food services; clothing; athletic equipment; arts and crafts materials; restaurant equipment and supplies; gardening and farming equipment; hardware; laundry equipment and supplies; and institutional furnishings and supplies.		Sheriff specialty
OC-15	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that offer or provide services, goods, or programs relating to drug or alcohol related disorders/problems.		HCA specialty
OC-16	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that offer or provide services, goods or programs related to HIV programs.		HCA specialty



**ORANGE COUNTY CONFLICT OF INTEREST
STANDARD DISCLOSURE CATEGORIES**
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No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-17	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that offer or provide services or programs related to tobacco prevention and treatment or that receive Tobacco Settlement Revenue from Orange County.		HCA specialty
OC-18	All interests in real property in Orange County, as well as investments in, business positions with and sources of income (including gifts, loans and travel payments) from sources that construct or destroy wells on real property subject to the jurisdiction of the Well Standards Advisory Board.		HCA specialty
OC-19	All investments in, business positions with and income (including gifts, loans and travel payments) from sources which may receive funds from the consortia or which may contract with the consortia to provide services used by the consortia, including but not limited to community-based organizations, home health agencies, hospices, AIDS foundations, dentists, physicians, and mental health providers.		HCA specialty
OC-20	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide pharmaceutical services, supplies, materials or equipment.		HCA specialty
OC-21	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide laboratory or chemical-related goods, supplies, equipment, or services (including training and consulting services).		HCA specialty
OC-22	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide education or training services or management consultation.		Probation specialty
OC-23	All interests in real property in Orange County, as well as investments in, business positions with, and income (including gifts, loans and travel payments) from sources that provide leased facilities and goods, supplies, equipment, vehicles, machinery or services (including training and consulting services) of the types used by the County Department; services in the field of corrections; legal services; building construction; or facility maintenance/repair.		Probation specialty
OC-24	All interests in real property in Orange County, as well as, all investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide placement or diversion facilities/homes, counseling or treatment in a behavioral science or community resource programs.		Probation specialty
OC-25	All interests in real property in Orange County, the District or Authority as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide ambulance service, tow service, tow service auto salvage as used by the County department.		



**ORANGE COUNTY CONFLICT OF INTEREST
STANDARD DISCLOSURE CATEGORIES**
(**Updated 4-14-26**)

No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-26	All interests in real property in Orange County, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide property for lease or purchase; lease property from the County; provide property management, appraisal, rights of way, relocation assistance, title, escrow and real estate services and/or studies; provide capital for the purchase of property used or sold by Orange County; who purchase property as a result of any civil sale pursuant to a court order or purchase property from a business entity where such business engages in transactions of real estate, real estate development or business development.		Sheriff specialty
OC-27	All investments in, business positions with and sources of income (including gifts, loans and travel payments) from sources that are engaged in banking and/or investment business.		Finance
OC-28	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide services or goods that are within the jurisdiction of the board, commission or committee or department.	General advisory BCC or department	BCCs
OC-29	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that are subject to inspection or regulation by the County Department, Authority or District, as applicable.	Specific regulatory function	HCA specialty
OC-30	Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest category in the code subject to the following limitation: The County Department Head/Director/General Manager/Superintendent/etc. may determine that a particular consultant, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant’s duties and, based upon that description, a statement of the extent of disclosure required. The determination of disclosure is a public record and shall be filed with the Form 700 and retained by the Filing Officer for public inspection.	Consultants	Consultant
OC-31	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that are subject to the regulatory, inspection, permit or licensing authority of the County, District or Authority as applicable.	General regulatory function (BCC)	Property appraisal
OC-32	All investments in, business positions with and income (including gifts loans and travel payments) from sources that are engaged in any real estate activity within the geographical boundaries of the County, District or Authority as applicable, including but not limited to real estate appraisal, development, construction, sales, brokerage, leasing, lending, insurance or property management.		



**ORANGE COUNTY CONFLICT OF INTEREST
STANDARD DISCLOSURE CATEGORIES**
(**Updated 4-14-26**)

No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-33	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that are within the jurisdiction of the board, commission or committee.	BCC general	
OC-34	All interests in real property as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide services in the field of corrections, legal services, placement or diversion facilities/homes, counseling or treatment in a		Probation Specialty Sheriff
OC-35	All interest in real property in Orange County where such property was purchased or is utilized by the County for voice/data communication or data processing for financial considerations; or where such property is utilized by any business entity having voice/data communication or data processing transactions for profit, with the County of Orange; or any real property in Orange County purchased as a result of any civil sale pursuant to a court order; and all investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide voice/data communications or data processing services, parts or equipment of the types utilized by the County.		
OC-36	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide services in the field of corrections, services in the field of research, or publications of criminal justice or management books, periodicals or professional journals.		Probation Specialty
OC-37	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide food services or supplies which include but are not limited to wholesale food, retail food or restaurant equipment.		Probation Specialty
OC-38	All interests in real property in Orange County or the District, as applicable, as well as all investments in, business positions with and income (including gifts, loans and travel payments) from sources that are engaged in any real estate activity including, but not limited to real estate development and/or facility maintenance.		Probation Specialty
OC-39	All interests in real property in Orange County or the District, as applicable, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide wholesale or retail food services; clothing; athletic equipment; arts and crafts materials; restaurant equipment and supplies; gardening and farming equipment; hardware; laundry equipment and supplies; and institutional furnishings and supplies.		Sheriff - Administrative Manager 1 - Inmate Services



**ORANGE COUNTY CONFLICT OF INTEREST
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No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-40	All interests in real property in Orange County or the District, as applicable, as well as investments in business positions with and income (including gifts, loans and travel payments) from sources that provide services in the field of corrections, real estate or leasing services, legal services, bail bond services, security, architectural or building construction, maintenance/repair, custodial services or utility services used by the County Department, Authority or the District, as applicable.		Sheriff - Administrative Manager 1 - Inmate Services
OC-41	All interests in real property in Orange County, the District or Authority, as applicable, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide services, supplies, materials, machinery, vehicles, or equipment (including training and consulting services) used by the County Department, Authority or District, as applicable.		Used by CalOptima, Orange County Fire Authority, Orange County Sanitation District, Sunset Beach Sanitary District, East Orange County Water District and Yorba Linda Water District
OC-42	Investments and business positions in business entities, and sources of income, (including gifts, loans, and travel payments), that have filed claims, or have claims pending against the Agency.		Used by the Northern Orange County Self-Funded Workers' Compensation Agency
OC-43	All income, investments, and business positions; and all income from gifts, to the extent the same arise from entities dealing in engineering design or other engineering work on public agency projects and construction firms and construction related enterprise of any kind dealing with public agency projects, or otherwise doing business in the engineering or construction sector or any other supporting business section within Orange County, the Authority or the District, as applicable.		Used by the South Coast Water District
OC-44	All interests in real property in Orange County or the District, as applicable, as well as investments in, business positions with and income (including gifts, loans and travel payments) from sources that are engaged in banking and/or investment business and/or from sources that invest funds or engage in the business of insurance including, but not limited to insurance companies, carriers, holding companies, underwriters, brokers, solicitors, agents, adjusters, claims managers and actuaries; from financial institutions including but not limited to, banks, savings and loans associations and credit unions or from sources that have filed a claim, or have a claim pending, against the County, Authority or the District, as applicable.		Used the Orange County Fire Authority
OC-45	This category was used in the past for "officials who manage public investments". We now display these individuals as 87200 filers in the system. Therefore, this category is no longer used and was removed from the system.		



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No.	Disclosure Category	Extent of Disclosure	Typical Positions (list not exhaustive)
OC-46	All investments in, business positions with, and income (including gifts, loans and travel payments) from sources that provide services, supplies, materials, machinery, equipment (including training and consulting services) used by the charter school, as well as interests in real property within a 2-mile radius of every school facility owned or operated by the charter school.		Used by Charter School
OC-47	All investments in, business positions with and income (including gifts, loans and travel payments) from sources that provide services in the field of corrections, research, education or training; publications of criminal justice; management books, periodicals or professional journals; or management consultation.		Probation specialty
OC-48	All interests in real property in Orange County, as well as all investments in, business positions with, and income (including gifts, loans and travel payments) from sources engaged in the direct or indirect provision of early development services to or for children. As used herein, “early development services” means the services which the Commission is authorized by statute to promote, support or improve.		Children and Families Commission of Orange County
OC-49	All investments in, business positions with and income (including gifts, loans and travel payments) from any source that is an educational service agency, educational supplier, or manufacturer of education materials, equipment or supplies, or any source normally providing goods and services to the Orange County Department of Education. All investments in, business positions with, and income (including gifts, loans and travel payments) from any source which within the last two years has contracted with or in the foreseeable future may contract with the Orange County Board of Education to provide leased facilities, services, supplies, materials, machinery or equipment to the Orange County Department of Education.		Orange County Department of Education