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CITY OF SEBASTOPOL
RESOLUTION NO. 6808-2026

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SEBASTOPOL APPROVING THE 2026 BIENNIAL REVIEW AND AMENDING THE CITY OF SEBASTOPOL CONFLICT OF INTEREST CODE PURSUANT TO THE POLITICAL REFORM ACT

WHEREAS, the Political Reform Act of 1974, Government Code Section 81000 et seq. (the "Act"), requires every local government agency to adopt a Conflict of Interest Code that designates the positions within the agency that make or participate in making governmental decisions that may foreseeably have a material financial effect on any financial interest, and that specifies the types of financial interests those designated positions must disclose; and

WHEREAS, Government Code Section 87306.5 requires every local agency to review its Conflict of Interest Code biennially and, if a change is necessitated by changed circumstances, to submit an amended Conflict of Interest Code to its code reviewing body; and

WHEREAS, the Fair Political Practices Commission ("FPPC") has adopted Section 18730 of Title 2 of the California Code of Regulations, which contains the terms of a standard Conflict of Interest Code that may be incorporated by reference in a local agency's Conflict of Interest Code and that may be amended by the FPPC to conform to amendments in the Act after public notice and hearings; and

WHEREAS, the City Council of the City of Sebastopol is the Code Reviewing Body for the City of Sebastopol Conflict of Interest Code, and last approved the City's Conflict of Interest Code on November 19, 2024; and

WHEREAS, City staff has completed the 2026 biennial review of the Conflict of Interest Code and the 2026 Local Agency Biennial Notice, and has determined that amendments are necessary to include new positions, revise disclosure categories, revise the titles of existing positions, delete titles of positions that have been abolished or no longer make or participate in making governmental decisions, and make technical corrections; and

WHEREAS, the amended Conflict of Interest Code, attached hereto as Exhibit A, designates all positions within the City that make or participate in the making of governmental decisions, assigns disclosure categories that require the disclosure of all investments, business positions, interests in real property, and sources of income that may foreseeably be affected materially by the decisions made by those designated positions, and includes all other provisions required by Government Code Section 87302; and

WHEREAS, the City Council has considered the staff report and all public comment on this matter at a duly noticed public meeting; and

WHEREAS, the adoption of this Resolution is not a project within the meaning of the California Environmental Quality Act ("CEQA") pursuant to CEQA Guidelines Section 15378(b)(5), as it is an organizational or administrative activity of government that will not result in direct or indirect physical changes in the environment.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Sebastopol as follows:

Section 1. Recitals. The foregoing recitals are true and correct and are incorporated herein as findings of the City Council.

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Section 2. Biennial Review. The City Council, acting as the Code Reviewing Body, accepts the 2026 Local Agency Biennial Notice and finds that the biennial review of the City of Sebastopol Conflict of Interest Code required by Government Code Section 87306.5 has been completed.

Section 3. Approval of Amended Code. The City Council hereby approves and adopts the amended City of Sebastopol Conflict of Interest Code, including Appendix A (Designated Positions) and Appendix B (Disclosure Categories), attached hereto as Exhibit A and incorporated herein by this reference.

Section 4. Incorporation of Regulation 18730. The terms of Title 2, California Code of Regulations, Section 18730, and any amendments to it duly adopted by the FPPC, are hereby incorporated by reference and, together with Exhibit A, constitute the Conflict of Interest Code of the City of Sebastopol.

Section 5. Supersession. The amended Conflict of Interest Code supersedes the Conflict of Interest Code approved by the City Council on November 19, 2024, and all prior Conflict of Interest Codes of the City of Sebastopol.

Section 6. Filing Officer Duties. The City Clerk, as Filing Officer, is directed to (a) notify each person holding a newly designated position of the obligation to file an Assuming Office Statement of Economic Interests (Form 700) within thirty (30) days of the effective date of this Resolution; (b) notify each person holding a position deleted from the Code of the obligation to file a Leaving Office Statement within thirty (30) days; and (c) maintain the amended Conflict of Interest Code for public inspection.

Section 7. Severability. If any section, subsection, sentence, clause, or phrase of this Resolution or of the amended Conflict of Interest Code is held invalid, such decision shall not affect the validity of the remaining portions.

Section 8. Effective Date. This Resolution shall take effect immediately upon its adoption.

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The above and foregoing Resolution was duly passed, approved, and adopted at a meeting of the City Council of the City of Sebastopol held on the 17th day of November 2026, by the following vote:

VOTE:
AYES: Councilmembers Carter, Hinton, Zollman, Vice Mayor Maurer and Mayor McLewis
NOES: None
ABSENT: None
ABSTAIN: None

APPROVED: Signed by: Jill McLewis 7C6BCED0A8914A1... Mayor Jill McLewis

ATTEST: Signed by: Mary Gourley 44C0774260FE430... Mary Gourley, City Manager

APPROVED AS TO FORM: Signed by: Alex Mog 66BDB79D572A4EB... Alex Mog, City Attorney

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EXHIIBT A
CITY OF SEBASTOPOL
CONFLICT OF INTEREST CODE

In compliance with the Political Reform Act of 1974, California Government Code Section 81000 et. seq., and specifically with Section 87300 et. seq., the City of Sebastopol adopted its current Conflict of Interest Code. All employees or identified contractors of the City holding positions designated in the adopted Conflict of Interest Code are required to file a Statement of Economic Interest (SEI) using the Fair Political Practices Commission (FPPC) Form 700. The requirements of this code are in addition to other requirements of the Political Reform Act, such as the general prohibition against conflicts of interest contained in Government Code 87100, and are in addition to any other state or local laws pertaining to conflicts of interest.

Additionally, Government Code Section 87200 identifies elected and appointed officials as statutory filers who are required to file Statements of Economic Interests.

SECTION 1. AUTHORITY
Government Code Section 87300 requires the City of Sebastopol to adopt a Conflict of Interest Code.

SECTION 2. PURPOSE
The purpose of the City of Sebastopol Conflict of Interest Code is to incorporate by reference the terms of Section 18730 of the California Code of Regulations pertaining to Conflict of Interest Codes.

SECTION 3. CODE REVIEWING BODY
The City Council of the City of Sebastopol shall be the Code Reviewing Body for the City of Sebastopol Conflict of Interest Code.

SECTION 4. FILING OFFICER
The City Clerk of the City of Sebastopol shall be the Filing Officer for the City of Sebastopol Conflict of Interest Code. All persons occupying designated positions shall file Statements of Economic Interests with the City Clerk.

The City Clerk shall make statements available for public inspection and reproduction, shall retain all statements pursuant to State Law, and shall perform all other duties and responsibilities of the Filing Officer pursuant to State Law.

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APPENDIX A

CITY OF SEBASTOPOL
CONFLICT OF INTEREST CODE

The persons occupying the following positions are designated employees for the purposes of this Conflict of Interest Code and shall disclose their financial interests in accordance with the disclosure categories set forth herein and are required to submit Statements of Economic Interests pursuant to the Political Reform Act of 1974.

The Mayor, Members of the City Council and Planning Commission, the City Manager, the City Attorney, the City Treasurer, and All Other City Officials who manage public investments, as defined by 2 Cal. Code of Regs. §18700.3(b), are NOT subject to the City's Code but must file disclosure statements under Government Code section 87200 et seq.

POSITION	DISCLOSURE CATEGORY
Administrative Services Accountant/Analyst (Confidential)	2
City Clerk	1
Planning Director	1
Associate Planner	1
Director of Public Works	1
Public Works Operations Supervisor	3
Police Chief	1
Police Lieutenant	3
Design Review Board and Tree Board	1
Consultants*	Per City Manager determination*

* Consultant means an individual who, pursuant to a contract with a State or local government agency:
Makes a governmental decision whether to:
(i) Approve a rate, rule or regulations;
(ii) Adopt or enforce a law; Issue, deny, suspend, or revoke any permit, license, application, certificate, approval order, or similar authorization or entitlement;
(iii) Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract that requires agency approval;
(iv) Grant agency approval to a contract that requires agency approval and to which the agency is a party, or to the specifications for such a contract;
(v) Grant agency approval to a plan, design, report, study or similar item;
(vi) Adopt, or grant agency approval of policies, standards, or guidelines for the agency, or for any subdivision thereof; or Serves in a staff capacity with the agency and in that capacity participates in making a governmental decision as defined in regulation 18702.2 or performs the same or substantially all the same duties for the agency that would otherwise be performed by an individual holding a position specified in the agency's Conflict of Interest code under Government Code Section 87302.

Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation: The City Manager may determine in writing 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 described 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 requirements.

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The City Manager's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code.

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APPENDIX B

CITY OF SEBASTOPOL
CONFLICT OF INTEREST CODE
DISCLOSURE CATEGORIES

All designated employees shall disclose their financial interests in accordance with the categories set forth in Appendix "A"

The disclosure category listed below identifies the types of economic interests that the designated position must disclose for each disclosure category to which he or she is assigned.

"Investment" means financial interest in any business entity (including a consulting business or other independent contracting business) and are reportable if they are either located in, doing business in, planning to do business in, or have done business during the previous two years in the jurisdiction of the City.

Disclosure Categories Defined

1. Category 1

Persons designated in this category shall disclose:
All investments, business positions in, and income from sources located in or doing business in the jurisdiction. Interests in real property located in the jurisdiction, including property located within a two-mile radius of the jurisdiction or of any property owned or used by the agency. Income shall include gifts, loans, and travel payments. All sources of income, including investments, gifts, loans and travel payments as defined in Government Code Section 82030, or as amended.

2. Category 2

Individuals in this category shall disclose all investments and business positions in business entities, and income from sources which: 1) are contractors or subcontractors engaged in the performance of work or services of the type utilized by the City, or 2) which manufacture or sell supplies, material, machinery or equipment of the type utilized by the City.

3. Category 3

Individuals in this category shall disclose all investments and business positions in business entities, and income from sources which: 1) are contractors or subcontractors engaged in the performance of work or services of the type utilized by the designated employee's department, or 2) which manufacture or sell supplies, material, machinery or equipment of the type utilized by the designated employee's department.

Statements of Economic Interests

Individuals holding designated positions shall file their Assuming Office statements within 30 days of assuming office, and thereafter, no later than April 1 of each year for the previous full calendar year. Statements shall be filed in the Office of the City Clerk (Location: 7120 Bodega Avenue, Sebastopol, CA 95472) which will make the statements available for public inspection and reproduction (Government Code Section 81008). Upon leaving a designated filer position, Leaving Office statements must be filed within 30 days of separation.

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2026 Local Agency Biennial Notice

Name of Agency: City of Sebastopol

Mailing Address: 7120 Bodega Avenue, Sebastopol, CA 95472

Contact Person: Mary Gourley Phone No. 707 823 1153

Email: mgourley@cityofsebastopol.gov Alternate Email: _____

Accurate disclosure is essential to monitor whether officials have conflicts of interest and to help ensure public trust in government. The biennial review examines current programs to ensure that the agency's code includes disclosure by those agency officials who make or participate in making governmental decisions.

This agency has reviewed its conflict of interest code and has determined that *(check one BOX):*

☒ **An amendment is required. The following amendments are necessary:**

(Check all that apply.)

- ☒ Include new positions
- ☐ Revise disclosure categories
- ☒ Revise the titles of existing positions
- ☒ Delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions
- ☐ Other *(describe)* _____

☐ **The code is currently under review by the code reviewing body.**

☐ **No amendment is required.** (If your code is over five years old, amendments may be necessary.)

Verification **(to be completed if no amendment is required)**

This agency's code accurately designates all positions that make or participate in the making of governmental decisions. The disclosure assigned to those positions accurately requires that all investments, business positions, interests in real property, and sources of income that may foreseeably be affected materially by the decisions made by those holding designated positions are reported. The code includes all other provisions required by Government Code Section 87302.

Signed by:
Mary Gourley
44C0774260FF430

Signature of Chief Executive Officer

Nov 18, 2026

Date

All agencies must complete and return this notice regardless of how recently your code was approved or amended. Please return this notice no later than **October 1, 2026**, or by the date specified by your agency, if earlier, to:

(PLACE RETURN ADDRESS OF CODE REVIEWING BODY HERE)

PLEASE DO NOT RETURN THIS FORM TO THE FPPC.