

2020 Local Agency Biennial Notice

Name of Agency: Highlands Recreation District
Mailing Address: 1851 Lexington Ave., San Mateo, CA 94402
Contact Person: Board Secretary, Amanda Armstrong Phone No. 650-341-4251
Email: amanda@highlandsrec.ca.gov Alternate Email: admin@highlandsrec.ca.gov

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.*)

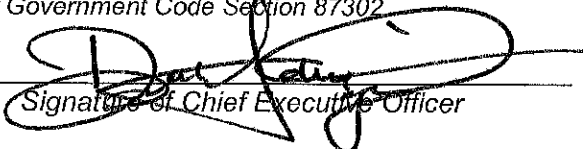
- Include new positions
- Revise disclosure categories
- Revise the titles of existing positions
- Delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions
- Other (*describe*) _____

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.



Signature of Chief Executive Officer

10/13/2020

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, 2020**, 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.

CONFLICT OF INTEREST CODE OF THE
HIGHLANDS RECREATION DISTRICT
COUNTY OF SAN MATEO, STATE OF CALIFORNIA
APPROVED OCTOBER, 2020

The Political Reform Act, Government Code Section 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 Adm. Code Section 18730, which contains the terms of a standard Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 California Adm. Code Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the attached Appendix in which officials and employees are designated and disclosure categories are set forth, constitute the Conflict of Interest Code of the Highlands Recreation District. (Hereafter “Agency.”)

Pursuant to 2 California Administrative Code Section 18730 (b)(4), all designated employees shall file statements of economic interests with the agency which shall be the filing officer. The San Mateo County Board of Supervisors shall be the code reviewing body.

HIGHLANDS RECREATION DISTRICT
LIST OF DESIGNATED EMPLOYEES AND DISCLOSURE
CATEGORIES FOR CONFLICT OF INTEREST CODE

Each person holding any position listed below must file statements disclosing the kinds of financial interests shown for the employee's position. Statements must be filed at the times and on the forms prescribed by law. Failure to file statements on time may result in penalties including but not limited to late fines.

Designated Positions	Assigned Disclosure Categories
Board of Directors	1, 2, 3
General Manager	1, 2, 3
Consultants*	1, 2, 3

Disclosure Categories

That the disclosures which are required of the designated employees are the following:

1. Interests in real property which are located in whole or in part:
(1) within the boundaries of the District, (2) within two miles of the boundaries of the District, or (3) within two miles of any land owned or used by the District, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property.
2. Investments and business positions in business entities, or income from sources which engage in land development, construction or the acquisition or sale of real property within the District.
3. Investments and business positions in business entities, or income from sources which: (1) are contractors or subcontractors engaged in the performance of work or services of the type utilized by the District, or (2) which provide, manufacture or sell supplies, materials, machinery or equipment of the type utilized by the District.

*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 limitations.

The General Manager may determine in writing that a particular consultant, although a "designated position", is hired to perform a range of duties that are 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 on that description; a statement of the extent of the disclosure requirements. The General Manager's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict on interest code.

Consultants at Highlands Recreation District:

1. Portor Goltz, Counsel – Mr Goltz provides legal counsel to the HRD and to several other clients. In an abundance of caution, he submits a Form 700 disclosure each year.
2. Michael O'Connor, R.J. Ricciardi & Associates – Mr. O'Connor provides accounting guidance and oversight of the annual audit process of the HRD and many other clients. Mr. O'Connor is not required to provide disclosure.

Any other consultants who may provide services to HRD are contracted to do so on a very time- and scope-limited basis. They are not required to provide disclosure.

Last update: October 2020