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

APPROVED JUNE, 2025

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 officials and 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 POSITIONS 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 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
District General Counsel	1, 2, 3
Consultants*	1, 2, 3
General Manager	1, 2, 3
Assistant General Manager	1, 2, 3
K-8th Child Care Director	1, 3
Early Education Center Director	1, 3
Aquatic Supervisor	1, 3

Disclosure Categories
That the disclosures which are required of the designated positions 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 positions 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 of interest code.

Consultants at Highlands Recreation District:
Auditor retained to provide accounting guidance and oversight of the annual audit process of the HRD

and many other clients is not required to provide disclosure.

Any other consultants retained to provide services to HRD on a very time and scope-limited basis are not required to provide disclosure.

Last update: June 2025