



**TOWN OF LOS GATOS
COUNCIL AGENDA REPORT**

MEETING DATE: 09/15/2026

ITEM NO: 9

DATE: September 15, 2026
TO: Mayor and Town Council
FROM: Chris Constantin, Town Manager
SUBJECT: **Adopt a Resolution Rescinding Resolution 2024-046 and Amending the Appendices to the Town Conflict of Interest Code Section 2.30.610**

RECOMMENDATION: Adopt a resolution rescinding Resolution 2024-046 and amending the appendices to the Town Conflict of Interest Code, Section 2.30.610.

FISCAL IMPACT:

There is no fiscal impact associated with this agenda item.

STRATEGIC PRIORITY:

This item does not directly address a Strategic Priority; however, it aligns with the Core Goal of Good Governance.

BACKGROUND:

The Political Reform Act requires local agencies to adopt and maintain a Conflict of Interest Code. The Act further requires that in even-numbered years, before October 1, local agencies must conduct a biennial review and update of their Conflict of Interest Code to determine if it is still accurate and address any new positions that must be listed in the local code.

The Town of Los Gatos adopted the Conflict of Interest Code as part of the Town Code in Chapter 2, Article III, Division 4. Revisions to the Conflict of Interest Code may be made by resolution, pursuant to Ordinance 2139, adopted by the Town Council on February 8, 2005. On December 19, 2017, the Council amended the Conflict of Interest Code with the adoption of

PREPARED BY: Wendy Wood
Town Clerk

Reviewed by: Town Manager, Assistant Town Manager, Town Attorney, and Administrative Services Director

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Ordinance 2267, which mandates all Conflict of Interest filers must file the Form 700 electronically via NetFile, the Town's e-filing system, beginning February 1, 2019.

In 2022, the Town updated its Conflict of Interest Code to add new positions and change the name of the Finance Commission from the Council Finance Committee to the Finance Commission. At that time, the General Plan Advisory Committee was also removed, as the Committee had completed its work. Additionally, the disclosure categories (Attachment 1, Exhibit B) were consolidated into three categories to streamline the reporting requirements applicable to designated positions.

In 2024, the Town updated its disclosure filing requirements to align designated positions and committees with their respective duties and responsibilities. The Administrative Analyst, Permit Technician, and Personnel Board were removed from the list of required filers because their responsibilities did not require disclosure under the applicable requirements. The Building Board of Appeals was removed following its disbandment, and the Diversity, Equity, and Inclusion Commission was added to the list of required filers.

DISCUSSION:

As required by the Political Reform Act, the Town has conducted its biennial review of the Conflict of Interest Code and List of Designated Positions. Based on this review, staff is proposing revisions to reflect the Town's current organizational structure and ensure consistency with the reporting requirements applicable to designated positions. The proposed changes include adding the Division Manager position, changing the Finance Director title to Administrative Services Director, and changing the Information Technology (IT) Manager title to Information Technology (IT) Director. The Information Technology (IT) System Administrator title has also been updated to use the full department name for consistency. The proposed revisions are reflected as redline changes in Attachment 1.

Those in designated positions are required to file the Fair Political Practices Commission (FPPC) Form 700, Statement of Economic Interests, annually by April 1 with the Town Clerk. The proposed revisions will ensure the List of Designated Positions remains current and accurately identifies positions subject to the Political Reform Act's reporting requirements.

CONCLUSION:

The proposed revisions complete the Town's biennial review of its Conflict of Interest Code and fulfill the Political Reform Act requirement to review and, as necessary, update the Code and List of Designated Positions. These revisions ensure the List of Designated Positions reflects the Town's current organizational structure and the reporting requirements applicable to designated positions. Staff recommends that the Town Council adopt the proposed resolution.

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COORDINATION:

The preparation of this report was coordinated with the Town Attorney's Office.

ENVIRONMENTAL ASSESSMENT:

This is not a project defined under CEQA, and no further action is required.

Attachments:

1. Redline Designated Positions
2. Draft Resolution with Exhibits A and B