



Kensington Community Services District

DATE: February 12, 2026

TO: Board of Directors

FROM: David Aranda, Interim General Manager (IGM)

SUBJECT: Adopt Board Resolution No. 2026-03 to Amend Conflict of Interest Code

RECOMMENDATION:

Staff recommends that the Board adopt Resolution No. 2026-03 amending the Conflict of Interest Code of Kensington Community Services District ("KCSD").

BACKGROUND:

The Political Reform Act (the "Act") requires all public agencies to adopt and maintain a Conflict of Interest Code containing the rules for disclosure of personal assets and the prohibition from making or participating in making governmental decisions that may affect any personal assets. The Conflict of Interest Code must specifically designate all agency positions that make or participate in the making of decisions and assign specific types of personal assets to be disclosed that may be affected by the exercise of powers and duties of that position.

The Act further requires that agencies regularly review and update their Codes as necessary when directed by the code-reviewing body or when change is necessitated by changed circumstances (Government Code Sections 87306 and 87306.5).

Pursuant to the Act, KCSD adopted a Conflict of Interest Code which was approved by the Contra Costa County Board of Supervisors. Review of the Code shows that it must be amended to reflect the consolidation Kensington Police Protection & Community Services District and Kensington Fire Protection District into Kensington Community Services District, include new positions that must be designated and designate Officials Who Manage Public Investments (87200 filers).

Attached is a redlined version of the proposed amended Code showing the revisions made to the Conflict of Interest Code.

EXHIBIT(S):

- Board Resolution No. 2026-03
- Legislative (redlined) version of proposed amended Conflict of Interest Code
- Final amended Conflict of Interest Code
- Notice of Intent

RESOLUTION NO. 2026-03

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE KENSINGTON
COMMUNITY SERVICES DISTRICT ADOPTING AN AMENDED CONFLICT OF
INTEREST CODE PURSUANT TO THE POLITICAL REFORM ACT OF 1974**

The Board of Directors of the Kensington Community Services District does find as follows:

WHEREAS, the State of California enacted the Political Reform Act of 1974, Government Code Section 81000 et seq. (the “Act”), which contains provisions relating to conflicts of interest which potentially affect all officers, employees and consultants of the Kensington Community Services District (“KCS D”) and requires all public agencies to adopt and promulgate a Conflict of Interest Code; and

WHEREAS, the KCS D Board of Directors adopted a Conflict of Interest Code (the “Code”) which was amended on October 23, 2022, in compliance with the Act; and;

WHEREAS, subsequent changed circumstances within KCS D have made it advisable and necessary pursuant to Sections 87306 and 87307 of the Act to amend and update KCS D’s Code; and;

WHEREAS, the potential penalties for violation of the provisions of the Act are substantial and may include criminal and civil liability, as well as equitable relief which could result in KCS D being restrained or prevented from acting in cases where the provisions of the Act may have been violated; and

NOW, THEREFORE, THE BOARD OF DIRECTORS DOES RESOLVE AS FOLLOWS:

Section 1. The KCS D Board of Directors hereby adopt the proposed amended Conflict of Interest Code, a copy of which is attached hereto and shall be on file with the KCS D Board Clerk and available to the public for inspection and copying during regular business hours;

Section 2. The said amended Code shall be submitted to the Board of Supervisors of the County of Contra Costa for approval and said Code shall become effective at the time which the Board of Supervisors approves the proposed amended Code as submitted.

PASSED AND ADOPTED by the Board of Directors of the Kensington Community Services District upon motion by Director _____, seconded by Director _____, on _____, the 12th day of February, 2026, by the following vote to wit:

AYES:

NOES:

ABSENT:

ABSTAINED:

Sylvia Hacaj
President, Board of Directors

HEREBY CERTIFY the foregoing resolution was duly and regularly adopted by the Board of Directors of the Kensington Community Services District at the regular meeting of said Board held on _____, the 12th day of February, 2026.

Lynelle M. Lewis
Clerk of the Board

David Aranda
Interim General Manger

CONFLICT OF INTEREST CODE
of the
Kensington ~~Police Protection &~~ Community Services District
[~~Adopted October 13, 2022~~ Amended February 12, 2026]

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 Code of Regulations Section 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendix A and B designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Kensington ~~Police Protection and~~ Community Services District ("District")**.

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~~Officials Who Manage Public Investments shall electronically file their annual statements of economic interests directly with the Fair Political Practices Commission. All other officials and individuals individuals holding designated positions shall file their statements of economic interests with the District, which will make the statements available for public inspection and reproduction (Gov. Code Sec. 81008). All statements will be retained by the District.~~

The full text of Section 18730, together with any amendment thereto, may be found at:

www.fppc.ca.gov/the-law/fppc-regulations/regulations-index.html

~~Designated positions shall file annual statements of economic interests with the District. In the event that the designated position manages investments for the District, such official shall file the original of the statement with the Fair Political Practices Commission and file a copy with the District; all other designated positions shall file their statements with the District. The District shall retain said documents for the period required by applicable records retention regulations. Statements of Economic Interests are public records available for public inspection and reproduction.~~

CONFLICT OF INTEREST CODE
OF THE
KENSINGTON COMMUNITY SERVICES DISTRICT
OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

The following positions are NOT covered by the conflict of interest code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

Board Members
Finance Director
General Manager

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

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APPENDIX "A"
DESIGNATED POSITIONS

The designated positions listed below are required to file Form 700 Statements of Economic Interests disclosing certain personal financial interests. These positions are required to file the applicable individual schedules to report investments, business positions, sources of income and interests in real property located in the District's jurisdiction. The applicable schedules to be filed for each position are based on the disclosure category assigned to the designated position.

Designated Positions	Disclosure Category
Board Member [Designated as an 87200 filer]	4
General Manager [Designated as an 87200 filer]	4
District General Counsel	1
Employees with limited decision-making authority, such as purchasing, contracting for services, and/or making recommendations to the District Board or General Manager: <ul style="list-style-type: none"> • Chief of Police • Clerk of the Board • Finance Director [Designated as an 87200 filer] 	2
Consultant	3

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EXHIBIT "B"
DISCLOSURE CATEGORIES:

Disclosure Category 1: Persons in this category shall disclose:

- A. Interests in real property located entirely or partly within District boundaries, or within two miles of District boundaries, or of any landed owned or used by the District.
- B. Investments or business positions in or income (including gifts, loans and travel payments) from sources that provide, plan to provide, or have provided in the last two years' facilities, goods, software, hardware, or services, including consulting services, to the District, or are engaged in the acquisition of real property within the District.

Disclosure Category 2: Persons in this category shall disclose:

- A. All investments, business positions in, and income (including gifts, loans, and travel payments) from sources that manufacture, sell or provide goods, equipment, vehicles, machinery or services, including training or consulting services, of the type utilized by the employee's designated department.

Disclosure Category 3:

- A. Consultants shall disclose pursuant to the broadest disclosure category in the conflict-of-interest code subject to the following limitation: the General Manager may determine in writing that a particular consultant is hired to perform a range of duties that is limited in scope and, thus, is not required to comply with the full disclosure requirements described above, but instead must comply with more tailored disclosure requirements specific to that consultant. Such a determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of the disclosure requirements.

History

1. Original submitted March 17, 1977; approved March 21, 1978
2. Amended December 19, 1978; approved December 19, 1979
3. General amendments; approved January 6, 1981
4. General amendments; approved August 16, 1983
5. General amendments; approved August 2, 1988
6. General amendments; approved March 27, 1990
7. General amendments; approved December 15, 1992
8. General amendments; approved July 19, 1994
9. General amendments; approved February 6, 1996
10. No amendments required 1996; submitted July 11, 1996
11. No amendments required 1998; submitted August 31, 1998
12. No amendments required 2000; submitted September 11, 2000
13. No amendments required 2002; submitted June 24, 2002
14. No amendments required 2004; submitted August 2, 2004
15. No amendments required 2006; submitted July 19, 2006
16. Code under review 2018; submitted February 7, 2019
17. Code amendments required 2020; submitted October 7, 2020;
18. Approved by County Board of Supervisors 02-09-2021
19. Code amendments required 2022; submitted 09-28-22
20. General amendments; approved October 13, 2022

CONFLICT OF INTEREST CODE
of the
Kensington Community Services District
[Amended February 12, 2026]

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Officials Who Manage Public Investments shall electronically file their annual statements of economic interests directly with the Fair Political Practices Commission. All other officials and individuals holding designated positions shall file their statements of economic interests with the **District**, which will make the statements available for public inspection and reproduction (Gov. Code Sec. 81008).

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Disclosure Category 2: Persons in this category shall disclose:

- A. All investments, business positions in, and income (including gifts, loans, and travel payments) from sources that manufacture, sell or provide goods, equipment, vehicles, machinery or services, including training or consulting services, of the type utilized by the employee's designated department.

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