

**RESOLUTION NO. 26-11**  
**A RESOLUTION OF THE BOARD OF DIRECTORS**  
**OF THE TWENTYNINE PALMS WATER DISTRICT**  
**ADOPTING AN AMENDED CONFLICT OF INTEREST CODE**  
**PURSUANT TO THE POLITICAL REFORM ACT OF 1974**

**WHEREAS**, the State of California enacted the Political Reform Act of 1974, Government Code Section 81000, et seq., which contains provisions relating to conflicts of interest which potentially affect all officers, employees and consultants of the Twentynine Palms Water District and requires all public agencies to adopt and promulgate a conflict of interest code, a copy of which is attached hereto as Exhibit A; and

**WHEREAS**, the Twentynine Palms Water District Board of Directors adopted a conflict of interest code, which was amended on October 24, 2018, in compliance with the Act; and

**WHEREAS**, subsequent changed circumstances within the district have made it advisable and necessary pursuant to Sections 87306 and 87307 of the Act to amend and update the district'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 the district being restrained or prevented from acting in cases where the provisions of the Act may have been violated; and

**WHEREAS**, notice of the time and place of a public meeting on, and of consideration by the board of directors of, the proposed amended code was provided each affected designated employee and publicly posted for review at the offices of the district; and

**WHEREAS**, the district's proposed amendment includes revision of disclosure categories, deletes positions that have been abolished and/or positions that no longer make or participate in making governmental decisions and update the language to reflect newly passed SB 852 revising form 700 filing requirements for Public Officials who manage public investments; and

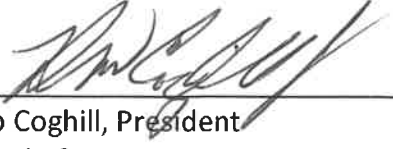
**WHEREAS**, a public meeting was held upon the proposed amended code at a regular meeting of the board of directors on July 15, 2026, at which all present were given an opportunity to be heard on the proposed amended code.

**NOW, THEREFORE, BE IT RESOLVED** by the Twentynine Palms Water District Board of Directors, that the board of directors does hereby adopt the proposed amended conflict of interest code, which shall be on file with the assistant board secretary and available to the public for inspection and copying during regular business hours;

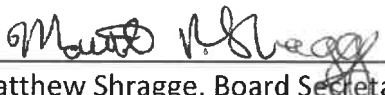
**BE IT FURTHER RESOLVED** that the said amended conflict of interest code shall be submitted to the County of San Bernardino Board of Supervisors for approval and said code shall become effective immediately after the board of supervisors approves the proposed amended code as submitted.

**PASSED, ADOPTED AND APPROVED** this 15th day of July 2026, by the following vote:

|                 |                                                             |
|-----------------|-------------------------------------------------------------|
| <b>Ayes:</b>    | <b>Directors Arthur, Bowden, Leazer, Woods, and Coghill</b> |
| <b>Noes:</b>    | <b>None</b>                                                 |
| <b>Abstain:</b> | <b>None</b>                                                 |
| <b>Absent:</b>  | <b>None</b>                                                 |

  
\_\_\_\_\_  
Bob Coghill, President  
Board of Directors

**ATTEST:**

  
\_\_\_\_\_  
Matthew Shragge, Board Secretary  
Twentynine Palms Water District



**CONFLICT OF INTEREST CODE  
OF THE  
TWENTYNINE PALMS  
WATER DISTRICT**

**CONFLICT OF INTEREST CODE**  
**OF THE**  
**TWENTYNINE PALMS WATER DISTRICT**

(Amended July 15, 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 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 Regulation 18730 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 incorporation page, Regulation 18730 and the attached Appendix designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Twentynine Palms Water District** (the "District").

Officials Who Manage Public Investments shall electronically file their annual statements of economic interests directly with the Fair Political Practices Commission. 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. (Government Code Section 81008.)

# **APPENDIX**

## **CONFLICT OF INTEREST CODE OF THE TWENTYNINE PALMS WATER DISTRICT**

**(Amended July 15, 2026)**

### **PART “A”**

#### **OFFICIALS WHO MANAGE PUBLIC INVESTMENTS**

Officials who manage public investments, as defined by 2 Cal. Code Regs. § 18700.3(b), are NOT subject to the District's Code but must file disclosure statements under Government Code section 87200 et seq. [(Regs. § 18730(b)(3)] These positions are listed here for informational purposes only.

It has been determined that the positions listed below are officials who manage public investments<sup>1</sup>:

Members of the Board of Directors

General Manager

Finance Manager

Financial Consultants

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<sup>1</sup> Individuals 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 § 87200.

## **DESIGNATED POSITIONS**

### **GOVERNED BY THE CONFLICT OF INTEREST CODE**

| <b><u>DESIGNATED POSITIONS'</u></b><br><b><u>TITLE OR FUNCTION</u></b> | <b><u>DISCLOSURE CATEGORIES</u></b><br><b><u>ASSIGNED</u></b> |
|------------------------------------------------------------------------|---------------------------------------------------------------|
| Director of Operations                                                 | 2, 3, 4                                                       |
| General Counsel                                                        | 1, 2                                                          |
| Maintenance Superintendent                                             | 2, 3, 5                                                       |
| Office & Personnel Manager                                             | 5                                                             |
| Treatment/Production Superintendent                                    | 5                                                             |

### Consultants and New Positions<sup>2</sup>

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<sup>2</sup> Individuals serving as a consultant as defined in FPPC Reg 18700.3(a) or in a new position created since this Code was last approved that makes or participates in making decisions must file under the broadest disclosure set forth in this Code subject to the following limitation:

The General Manager may determine that, due to the range of duties or contractual obligations, it is more appropriate to designate a limited disclosure requirement. A clear explanation of the duties and a statement of the extent of the disclosure requirements must be in a written document. (Gov. Code Sec. 82019; FPPC Regulations 18219 and 18734.). 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. (Gov. Code Sec. 81008.)

## **PART “B”**

### **DISCLOSURE CATEGORIES**

The disclosure categories listed below identify the types of economic interests that the designated position must disclose for each disclosure category to which the designated is assigned.<sup>3</sup> “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 or doing business in the jurisdiction, are planning to do business in the jurisdiction, or have done business during the previous two years in the jurisdiction of the District.

Category 1: All investments, business positions in business entities, and sources of income, (including receipt of gifts, loans and travel payments), that are located in, do business in or own real property within the jurisdiction of the District.

Category 2: All interests in real property which is located in whole or in part within, or not more than two (2) miles outside, the jurisdiction of the District, including any leasehold, beneficial or ownership interest or option to acquire property.

Category 3: All investments, business positions in business entities, and sources of income, (including gifts receipt of gifts, loans and travel payments), that are engaged in land development, construction or the acquisition or sale of real property within the jurisdiction of the District.

Category 4: All investments, business positions in business entities, and sources of income, (including receipt of gifts, loans and travel payments), that provide services (including training or consulting services), products, materials, machinery, vehicles or equipment of the type purchased or leased by the District.

Category 5: All investments, business positions in business entities, and sources of income, (including receipt of gifts, loans and travel payments), that provide services (including training or consulting services), products, materials, machinery, vehicles or equipment of the type purchased or leased by the designated position’s department, unit or division.

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<sup>3</sup> This Conflict of Interest Code does not require the reporting of gifts from outside this agency’s jurisdiction if the source does not have some connection with or bearing upon the functions or duties of the position. (Reg. 18730.1)