

RESOLUTION NO. F2026-07

**A RESOLUTION OF THE
FOOTHILL/EASTERN TRANSPORTATION CORRIDOR AGENCY AMENDING THE
CONFLICT OF INTEREST CODE, INCLUDING THE DESIGNATED POSITIONS
AND DISCLOSURE CATEGORIES, AS REQUIRED BY THE POLITICAL REFORM
ACT AND REGULATIONS OF THE FAIR POLITICAL PRACTICES COMMISSION**

WHEREAS, the Political Reform Act (Government Code Section 81000 et seq.) requires the Agency to adopt and promulgate a Conflict of Interest Code; and

WHEREAS, the Board of Directors incorporated the standard Conflict of Interest Code into the Amended and Restated Administrative Code, on May 9, 2024; and

WHEREAS, the Political Reform Act, in Government Code Section 87306, requires the Agency to review its Conflict of Interest Code biennially to determine whether amendments are required; and

WHEREAS, the Agency has determined that due to position changes, the Agency's Conflict of Interest Code requires revision;

NOW, THEREFORE, BE IT RESOLVED, by the Foothill/Eastern Transportation Corridor Agency as follows:

SECTION 1. The Foothill/Eastern Transportation Agency adopts by reference the model Conflict of Interest Code promulgated by the Fair Political Practices Commission as set forth in Section 18730 of the Title 2 of the California Code of Regulations, which, together with the Agency's List of Designated Positions and Disclosure Categories, collectively constitute the Foothill/Eastern Transportation Corridor Agency's Conflict of Interest Code. A copy of said Code is attached hereto as Exhibit A and shall be on file with the Clerk of the Board and available to the public for inspection and copying during regular business hours.

SECTION 2. The Board of Directors affirms that the Agency's Conflict of Interest Code, though incorporated into the Administrative Code, is a separate, statutorily mandated document subject to periodic review and amendment pursuant to the Political Reform Act. The Conflict of Interest Code may be amended by resolution of the Board without requiring amendment or restatement of the Administrative Code, and all other provisions of the Administrative Code shall remain in full force and effect unless expressly amended.

SECTION 3. To comply with biennial review requirements and timely submission to the code reviewing body, the Chief Executive Officer is authorized to (i) make changes to the Conflict of Interest Code Designated Positions and Conflict of Interest Code Disclosure Categories so long as the changes are not inconsistent with applicable law, and (ii) take all steps necessary to implement the changes.

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SECTION 4. The amended Conflict of Interest Code shall replace any previously adopted Conflict of Interest Code and shall become effective at the time of the adoption and approval of this Resolution.

Adopted this 13th day of August 2026, by the Board of Directors of the Foothill/Eastern Transportation Corridor Agency.



Patricia "Trish" Kelley, Chair
Foothill/Eastern Transportation Corridor Agency

Attachment A

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ATTEST:

I, Jennifer Macias, Clerk of the Board of the Foothill/Eastern Transportation Corridor Agency hereby certify that the foregoing Resolution No. F2026-07 was adopted on August 13, 2026, by the Board of Directors of the Foothill/Eastern Transportation Corridor Agency by the following vote:

Motion:	Scott Voigts
Yes:	12
No:	0
Absent:	Donald Wagner
Abstain:	0



Jennifer Macias, Clerk of the Board
Foothill/Eastern Transportation Corridor Agency

Attachment: Attachment A

Attachment A

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FOOTHILL/EASTERN TRANSPORTATION CORRIDOR AGENCY CONFLICT OF INTEREST CODE

The Political Reform Act (Government Code Sections 81000 et seq.) requires state and local government agencies to adopt conflict of interest codes. Pursuant to the Political Reform Act, the Fair Political Practices Commission has promulgated a regulation, (2 Cal. Admin. Code Section 18730) which sets forth a standard Conflict of Interest Code. The standard Conflict of Interest Code may be incorporated by reference by local agencies and may be amended from time to time by the Fair Political Practices Commission to conform to amendments to the Political Reform Act. The standard Conflict of Interest Code as set forth in 2 Cal. Admin. Code Section 18730, and any amendments thereto duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with Appendix E and Appendix F, in which positions are designated and the disclosure categories are set forth, constitute the Conflict of Interest Code of the Agency. Except for employees whose positions require that they file directly with the Fair Political Practices Commission electronically, pursuant to Section 4 of the standard Code, designated employees shall file statements of economic interests with the Agency filing official, who will make the statements available for public inspection and reproduction (Cal. Gov. Code § 82008). The Foothill/Eastern Transportation Corridor Agency's Clerk of the Board is the Agency's filing official and will retain the originals for all Agency officers and designated employees who do not file directly with the Fair Political Practices Commission.

The Foothill/Eastern Transportation Corridor Agency Conflict of Interest Code so adopted amends and replaces any Conflict of Interest Code of the Agency previously in effect.

Attachment A

APPENDIX E LIST OF DESIGNATED POSITIONS TO THE CONFLICT OF INTEREST CODE

Foothill/Eastern Transportation Corridor Agency

DESIGNATED POSITIONS	DISCLOSURE
Chief Capital Program Officer	1
Chief Toll Operations Officer	1
Corridor Manager	1
Deputy Chief Executive Officer	1
Deputy Chief Toll Operations Officer	1
Deputy Chief Capital Program Officer	1
Director, Environmental Planning	1
General Counsel	1
Senior Director, Design & Construction	1
Chief External Affairs Officer	2
Controller	2
Director, Communications	2
Director, Contracts & Procurement	2
Director, Customer Service	2
Director, Legislative & Government Affairs	2
Director, Information Technology	2
Manager, Contracts & Procurement	2
Manager, Construction	2
Manager, Facilities	2
Manager, Information Technology	2
Manager, Internal Audit	2
Manager, Toll Systems	2
Program Manager, Violation Processing & Toll Compliance	2
Senior Director, Human Resources	2
Senior Director, Tolling & Customer Information Systems	2
Consultant	*

*Consultants to Agency shall be subject to disclosure under Category 1 disclosures, subject to the following limitation:

Agency may determine in writing that a particular consultant or new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements of Category 1. In such cases, the Chief Executive Officer may designate a different disclosure requirement. Such designation must be made in writing and shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of the disclosure requirements. The Agency's

Attachment A

designation must be filed, in advance of disclosure by the consultant, with the Agency's conflict of interest code and must be delivered to the consultant along with a copy of the conflict of interest code and the manual and forms for disclosure (FPPC Form 700). The designation is a public record and shall be retained for public in the same manner and location as this Conflict of Interest Code. (Cal. Gov. Code § 81008.)

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

It has been determined that the positions listed below manage public investments, as defined by 2 Cal. Code of Regs. §18700.3(b), and shall file a Statement of Economic Interests pursuant to Government Code Section 87500 et seq. with the Fair Political Practices Commission (FPPC) using the Commission's electronic filing system.

Board Members
Alternate Board Members
Chief Executive Officer
Chief Financial Officer
Senior Director, Finance
Manager, Treasury Operations

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 FPPC makes the final determination whether a position is covered by Government Code Section 87200.

Attachment A

APPENDIX F DISCLOSURE CATEGORIES TO THE CONFLICT OF INTEREST CODE

Foothill/Eastern Transportation Corridor Agency

CATEGORY 1

All interests in real property in Orange County, as well as investments, business positions, and sources of income (including gifts, loans and travel payments).

CATEGORY 2

All investments, business positions and sources of income (including gifts, loans and travel payments).

The Political Reform Act (Government Code Sections 81000, et seq.) requires state and local government agencies to adopt Conflict of Interest Codes. Pursuant to the Political Reform Act, the Fair Political Practices Commission has promulgated a regulation, (2 Cal. Admin. Code Section 18730) which sets forth a model Conflict of Interest Code. The model Conflict of Interest Code may be incorporated by reference by local agencies and may be amended from time to time by the Fair Political Practices Commission to conform to amendments to the Political Reform Act.

Pursuant to Section 4 of the model Code, designated employees shall file statements of economic interests with the Agency filing official, who will make the statements available for public inspection and reproduction (Cal. Gov. Code § 82008). The Agency filing official will retain the originals for all filing Agency officers and designated employees.