

# December 8, 2025

**To:** Members of the Board of Directors

**From:** Darrell E. Johnson, Chief Executive Officer

**Subject:** Conflict of Interest Code and 2025 Annual Statement of Economic

Interests Filing

### Overview

Pursuant to the Orange County Transportation Authority's Conflict of Interest Code, Members of the Board of Directors and designated positions are required to file a Statement of Economic Interests - Form 700.

### Recommendations

- A. Approve the list of designated positions and disclosure categories subject to the Orange County Transportation Authority's Conflict of Interest Code.
- B. Direct the Clerk of the Board to distribute and monitor the 2025 annual Statement of Economic Interests Form 700 to Members of the Board of Directors and designated positions, to be filed by April 1, 2026.

## **Background**

The Political Reform Act, Government Code Section 81000, et seq., requires state and local government agencies to review their designated positions and disclosure categories to determine accuracy for the reporting period. Consistent with this requirement, the Orange County Transportation Authority annually reviews the list of designated positions for consideration and approval by the Board of Directors (Board).

### **Discussion**

The Orange County Transportation Authority (OCTA) Board, Chief Executive Officer, Deputy Chief Executive Officer, and Chief Financial Officer/Treasurer are all designated positions and required to file an annual Statement of Economic Interests - Form 700 (Form 700) with the County of Orange Clerk of the Board of Supervisors (Attachment A).

The other designated positions at OCTA are required to file a Form 700 with OCTA's Clerk of the Board (Attachment B). The People and Community Engagement Division and OCTA's General Counsel have reviewed and, as needed, made changes to the designated positions list and standard disclosure categories for 2025 (Attachment C).

With direction from the Board, OCTA's Clerk of the Board will forward the electronic or original Form 700s of the Board, Chief Executive Officer, Deputy Chief Executive Officer, and Chief Financial Officer/Treasurer to the County of Orange Clerk of the Board of Supervisors.

OCTA's Clerk of the Board will forward and retain the final electronic or original Form 700s submitted by all other designated positions for a period of seven years. The California Fair Political Practices Commission's filing deadline for the 2025 annual Form 700 is April 1, 2026.

## Summary

Consistent with the Political Reform Act, Government Code Section 81000, et seq., the Board annually reviews and approves the list of designated positions and disclosure categories subject to OCTA's Conflict of Interest Code. Following Board approval, OCTA's Clerk of the Board will forward the electronic or original Form 700s of the Board, Chief Executive Officer, Deputy Chief Executive Officer, and Chief Financial Officer/Treasurer to the County of Orange Clerk of the Board of Supervisors.

### **Attachments**

A. Conflict of Interest Code for the Orange County Transportation Authority (December 8, 2025)

B. Orange County Transportation Authority Designated Positions and Disclosure Category (December 8, 2025)

C. Orange County Transportation Authority Disclosure Categories (December 8, 2025)

Prepared by:

Andrea West Clerk of the Board (714) 560-5611 Approved by:

Jennifer L. Bergener Deputy Chief Executive Officer (714) 560-5462