

Attachment B - Conflict of Interest  
Code Supporting Documents for:  
Element Education

Community Montessori and Dimensions Collaborative School

January 9, 2026

COSD CLERK OF THE BOARD  
2026 JAN 16 AM 10:29

Element Education  
1441 Montiel Road # 143  
Escondido, CA 92026

To the County of San Diego Board of Supervisors,

Please find attached the amended Element Education Conflict of Interest Code for your approval.

Sincerely,



Terri Novacek  
Executive Director



Community Montessori & Dimensions Collaborative School

**MINUTES**

**Regular Board Meeting**  
**Element Education, Inc.**  
**September 26, 2025**  
**11:30 A.M. Closed Meeting**  
**12:00 P.M. Public Meeting**

**BOARD MEMBERS**

**Chris Nunley - President (June 2026)**  
**Barbara Rohrer - Vice President (June 2027)**  
**Suhas Subramanya-Clerk (June 2026)**  
**Terry Breckenridge – Community Member (June 2027)**  
**Amy Schaner-CM Parent Representative (June 2026)**

COSD CLERK OF THE BOARD  
 2025 JAN 16 AM 10:30

**NON-VOTING MEMBERS**

**Terri Novacek – Executive Director**

**LOCATION**

**1441 Montiel Road #143**  
**Escondido, CA 92026**

**1816 Oak Hill Drive**  
**Escondido, CA 92026**

**3751 Mary Lane**  
**Escondido, CA 92026**

**12370 Adobe Ridge Rd**  
**Poway, CA 92064**

**4646 Mission Gorge Place**  
**San Diego, CA 92120**

**1800 North Broadway**  
**Escondido, CA 92026**

**9580 Carlton Hills**  
**Santee, CA 92071**

**6797 Embarcadero Lane**  
**Carlsbad, CA 92011**

**1. OPENING PROVISIONS**

A. Call to Order and Roll Call 11:30 a.m.

Members present: C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya

Absent: A. Schaner

Secretary: T. Novacek

Recording Secretary: S. Michaels

B. Mr. Hopps shared public comments expressing support for Community Montessori and Ms. Novacek regarding Closed Session Item 2.a, Executive Director Contract. Ms. Novacek then read a public comment submitted by Mr. Aaron Lawler opposing Closed Session Item 2.a, Executive Director Contract.

C. Adjourn to Closed Session 11:36 a.m.

**2. CLOSED SESSION**

**3. PUBLIC SESSION**

Noon

A. Call to Order and Establishment of Quorum

B. Mr. Subramanya led the Pledge of Allegiance.

C. Approval of Agenda

MSC (Rohrer/Subramanya) to approve the agenda. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None



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Community Montessori & Dimensions Collaborative School

D. Mr. Nunley reported that the Board is pleased with the direction of Element Education and approved an extension of Executive Director Terri Novacek's contract.

#### 4. RECOGNITIONS AND PRESENTATIONS

A. Mr. Johnson recognized DCS Tech Lab Assistants, Dann Santos and Lam Nguyen, for their recent work with students.

B. Mr. Otte presented updates and activities within CM.

C. Mr. Johnson presented updates and activities within CM.

D. Ms. Sestina shared Student Services presentation with the Board.

#### 5. COMMUNICATIONS - Agenda and Non-Agenda Items

A. Tatiana Lawler expressed her disapproval of receiving a cease and desist for defamation from Element Education.

Adam Hopps, Dani Dell-Christy, Melissa McGinnis, Jennifer Butner, Brienne Cartwright, and Rebecca Finney shared public comments expressing their support for the Community Montessori program and administrative staff.

B. Ms. Novacek reported that the San Diego County Office of Education (SDCOE) completed its due diligence review of the complaint submitted by Mr. and Mrs. Lawler and found that Element Education complied with applicable laws, charter policies, and internal protocols and procedures. Ms. Novacek shared that she recently presented the scenario during a Title IX seminar conducted by a law firm, and they confirmed that the complaints were handled lawfully and that Element Education went above and beyond the required legal standards.

#### 6. APPROVAL OF CONSENT ITEMS

A. Approval of Meeting Minutes on August 22, 2025.

B. Approval of Check Runs for August 2025.

MSC (Rohrer/Subramanya) to approve the Consent Items. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None

#### 7. INFORMATION ITEMS - NO ACTION

A. Chief Business Officer Report

1. Mr. Miller presented current financial information for Community Montessori and Dimensions Collaborative School.
2. Mr. Miller provided recap of the Compensation meeting held on September 12, 2025.
3. Mr. Miller reported on recent technology projects and updates.



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Community Montessori & Dimensions Collaborative School

**B. Director of Human Resources Report**

1. Ms. Sihota reviewed her written report on recent hires and current openings.
2. Ms. Sihota reviewed her written report on employees who engaged in formal professional learning since the last board meeting.

**C. Chief Operations Officer Report**

1. Mr. Yung reported on the status of recent facility improvements.
2. Mr. Yung shared a report on resource management projects and improvements.

**D. Executive Director Report**

1. Ms. Novacek shared 98% of the Professional Learning Plan of Records have been completed and staff is ready to begin working on the new Learning Management System.
2. Ms. Novacek shared that there is nothing new to report on legislative bills that would impact Element Education schools.

**8. ACTION ITEMS**

**A. Element Education**

1. Approval of Revised Policies: Conflict of Interest and Board Membership

MSC (Rohrer/Breckenridge) to approve Revised Policies. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None

2. Approval of AI Usage Policy

MSC (Subramanya/Breckenridge) to approve the AI Usage Policy. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None

3. Approval of Broadway Lease Extension

MSC (Breckenridge/Rohrer) to approve the Broadway Lease Extension. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None

**B. Community Montessori**

1. Approval of iReady Diagnostics Renewal

MSC (Rohrer/Breckenridge) to approve iReady Diagnostics. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None



Community Montessori & Dimensions Collaborative School

- C. Dimensions Collaborative School
  - 1. Approval of iReady Diagnostics Renewal
  - 2. Consideration of SAVVAS Renewal Quote

MSC (Subramanya/Rohrer) to approve iReady Diagnostics Renewal and SAVVAS Renewal Quote. Motion passed (4-0) **Ayes:** C. Nunley, T. Breckenridge, B. Rohrer, S. Subramanya **Nays:** None **Abstain:** None

**9. FUTURE AGENDA ITEMS**

- Advisory Council Report
- Student Performance Data (CAASSP)

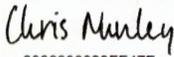
**10. NEXT MEETING DATE - Regular Board Meeting**

Ms. Novacek shared there may be a challenge getting a quorum for the October meeting and will work with the board to make sure there is proper notice of a reschedule or cancellation.

Date: October 31, 2025  
 Location: Administrative Offices  
 1441 Montiel Road #143  
 Escondido, CA 92026  
 Time: 11:30 AM Closed Meeting  
 12:00 PM Public Meeting

**11. ADJOURNMENT**

**1:03 p.m.**

Signed by:   
 8086908093FE47F... Date 12/6/2025

**Board President**

DocuSigned by:   
 019230B0ACD5424... Date 12/12/2025

**Board Secretary**

**RESOLUTION for Adopting Conflict of Interest Code and Appendix**

WHEREAS, the Political Reform Act, Government Code sections 87300-87313, requires each public agency in California to adopt a conflict of interest code; and

WHEREAS, Education Code section 47604.1, now requires charter schools in California to adopt a conflict of interest code; and

WHEREAS, the Governing Board of the Element Education, Inc. has previously adopted a local conflict of interest code; and

WHEREAS, past and future amendments to the Political Reform Act and implementing regulations may require conforming amendments to be made to the charter schools conflict of interest code; and

WHEREAS, a regulation adopted by the Fair Political Practices Commission, Title 2, Section 18730, of the California Code of Regulations provides that incorporation by reference of the terms of that regulation, along with an agency-specific appendix designating positions and disclosure categories shall constitute the adoption and amendment of a conflict of interest code in conformance with Government Code sections 87300 and 87306; and

WHEREAS, Element Education, Inc. has recently reviewed its positions, and the duties of each position, and has determined the conflict of interest code as set forth in the attached Appendix is current and necessary; and

WHEREAS, any earlier resolutions, bylaws, and/or appendices containing the charter school's conflict of interest code shall be rescinded and superseded by this resolution and Appendix; and

NOW THEREFORE BE IT RESOLVED that Element Education, Inc.'s Governing Board adopts the following Conflict of Interest Code including its Appendix of Designated Employees and Disclosure Categories.

PASSED AND ADOPTED THIS 5<sup>th</sup> day of December 2025 at a meeting, by the following vote:

AYES: \_\_\_\_\_ NOES: \_\_\_\_\_ ABSENT: \_\_\_\_\_

Dated: December 5, 2025

Signed by:  
*Chris Munley*  
8086908093FE47E

Board Member  
*[Signature]*  
1CC290253E734D7

Board Member  
*Barbara P. Roben*

Board Member  
Signed by:  
*Suresh Subramanya*  
259B07C78291497...

Board Member  
Signed by:  
*Terry Breckenridge*  
FD1495990E904D5...

**Conflict of Interest**

COSD CLERK OF THE BOARD  
2026 JAN 16 AM 10:30

**Subject: Conflict of Interest**

**Date of Origination:** 1/21/2006

**Last Revision Date:** ~~3/2/2022~~ 09/26/2025 (pending Board approval)-

**Scope:**

<b>Designated Positions</b>	<b>Disclosure Category</b>
Members of the Governing Board & Alternates	1, 2
Candidates for Members of the Governing Board	1, 2
Executive Director	1, 2
Chief Officers	3
School Directors, <del>Director of Student Services, Director of Advancement and Public Affairs-</del>	3
Consultants/New Positions (as determined by Executive Director, or designee)	1,2,3

**Policy/Disclosure Categories:**

Category 1

Designated positions assigned to this category must report:

- a. Interests in real property within the boundaries of Element Education facilities that are used by Element schools or are of the type that could be acquired by Element Education as well as real property within two miles of the property used or the potential site.
- b. Investments and business positions in business entities, and sources of income (including gifts, loans, and travel payments) of the type that engage in the purchase or sale of real property or are engaged in building construction or design.

Category 2

Designated positions assigned to this category must report investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent or distribute school supplies, books, materials, school furnishings or equipment of the type to be utilized by Element Education.

### Category 3

Designated positions assigned to this category must report investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent or distribute school supplies, books, materials, school furnishings or equipment of the type to be utilized by the school.

### **Disclosures for Consultants**

Consultants are designated employees who must disclose financial interests as determined on a case-by-case basis by the Director or designee. The Director or designee's written determination shall include a description of the consultant's duties and a statement of the extent of disclosure requirements based upon that description. All such determinations are public records and shall be retained for public inspection along with this conflict of interest code.

A consultant is an individual who, pursuant to a contract with the charter school, makes a governmental decision whether to: (2 CCR 18700.3)

1. Approve a rate, rule, or regulation
2. Adopt or enforce a law
3. Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement
4. Authorize the charter school to enter into, modify, or renew a contract that requires charter school approval
5. Grant charter school approval to a contract that requires charter school approval and in which the charter school is a party, or to the specifications for such a contract
6. Grant charter school approval to a plan, design, report, study, or similar item
7. Adopt or grant charter school approval of charter school policies, standards, or guidelines

A consultant is also an individual who, pursuant to a contract with the charter school, serves in a staff capacity with the charter school and in that capacity participates in making a governmental decision as defined in 2 CCR 18704, subsections (a) and (b), or performs the same or substantially all the same duties for the charter school that would otherwise be performed by an individual holding a position specified in the charter school's conflict of interest code. (2 CCR 18700.3)

**Procedure:**

Governing Board members and candidates, as well as employee positions that participate in the making of decisions that may foreseeably have a material effect on any financial interest, as set forth in subdivision (a) of section 87302 of the Government Code shall file statements of economic interests (Form 700) with the County of San Diego within 30 days of the assumed office date, annually by April 1<sup>st</sup>, and within 30 days of the leaving office date. All statements will be retained by Element Education and the County of San Diego and will be available for public inspection and reproduction (Government Code § 81008).

Conflict of Interest Code Supporting  
Documents for:  
Grossmont Union High School District



COMMITTED TO EXCELLENCE  
S I N C E 1 9 2 0

• GOVERNING BOARD MEMBERS

CHRIS FITE  
JIM KELLY  
ELVA SALINAS  
ROBERT SHIELD  
DR. GARY C. WOODS

COSD CLERK OF THE BOARD  
2026 JAN 20 AM 12:40

• SUPERINTENDENT

MARY BETH KASTAN

January 20, 2026

Clerk of the Board of Supervisors  
County Administration Center  
1600 Pacific Highway, Fourth Floor, Room 402  
San Diego, California 92101

Dear Clerk of the Board of Supervisors,

Attached is a copy of the Grossmont Union High School District (GUHSD) Governing Board approval for amending GUHSD's Conflict of Interest Code (COI).

Please forward the revised COI to the County Board of Supervisors for approval.

Thank you,

*Monica Osterloh*

Monica Osterloh  
Executive Assistant, Business Services



COSD CLERK OF THE BOARD  
2026 JAN 20 AM 12:43

Grossmont Union High School District

### Agenda Item Details

Meeting	Jan 15, 2026 - Regular Governing Board Meeting
Category	N. Action Items - Governing Board
Subject	1. Approval of First Reading and Option to Waive Second Reading of Board Bylaw 9270 and Exhibit 9270: Conflict of Interest
Access	Public
Type	Action, Policy Revision/Update - 1st Read
Recommended Action	Approval of First Reading and to Waive Second Reading of Board Bylaw 9270 and Exhibit 9270: Conflict of Interest

### Public Content

GUHSD Board Bylaw 9270 describes the District's Conflict of Interest reporting practices and Board Bylaw Exhibit 9270 specifies which District positions must file a Statement of Economic Interests Form 700. Together, the Board Bylaw and Board Bylaw Exhibit comprise the District's Conflict of Interest Code.

Effective January 1, 2026, Senate Bill 852 (SB 852) expanded the list of individuals who must file their Statement of Economic Interests (Form 700) directly with the Fair Political Practices Commission (FPPC) rather than through their local filing officer. Under this change, public officials who manage public investments, as defined in Government Code §87200, must now electronically file their Form 700 with the FPPC using the State's online system. GUHSD Board Bylaw 9270 has been revised to reflect this change.

Board Bylaw Exhibit 9270 has been updated to separate filers into this additional new category (filing with FPPC) and to reflect the addition of new management positions.

 [Revision of BB 9270 Conflict of Interest.pdf \(304 KB\)](#)

 [Revision of E 9270 Conflict of Interest Exhibit.pdf \(372 KB\)](#)

### Executive Content

### Motion & Voting

Approval of First Reading and to Waive Second Reading of Board Bylaw 9270 and Exhibit 9270: Conflict of Interest

Student Board Member - Absent

Motion by Gary Woods, second by Rob Shield.

Final Resolution: Motion Carried

Yes: Gary Woods, Rob Shield, Scott Eckert, Jim Kelly, Chris Fite

**CONFLICT OF INTEREST CODE FOR  
GROSSMONT UNION HIGH SCHOOL DISTRICT**

COSD CLERK OF THE BOARD  
2026 JAN 20 AM 12:42

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 adopted a regulation (2 Cal. Code of Regs. Section 18730) that contains the terms of a standard conflict of interest code and may 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 corresponding exhibit (E9270) designating positions and establishing disclosure requirements, shall constitute the conflict of interest code of the Grossmont Union High School District.

Individuals holding positions designated in Appendix I shall file their statement directly with the ~~Clerk of the Board of Supervisors via the County's online eDisclosure system.~~ **California Fair Political Practices Commission (FPPC) via the FPPC's electronic filing system.**

**Individuals holding positions designated in Appendix II shall file their statement directly with the County of San Diego via the County's electronic filing system.**

Individuals holding positions designated in Appendix III shall file their statements with the Grossmont Union High School District, which will retain the statements and make the statements available for public inspection and reproduction. (Gov. Code Section 81008.)

### Appendix I

Designated Positions	Disclosure Categories
<b>Assistant Superintendent, Business Services</b>	<b>1</b>
<b>District Superintendent</b>	<b>1</b>
<b>Executive Director, Fiscal Services</b>	<b>1</b>
<b>Governing Board</b>	<b>1</b>

### Appendix II

Designated Positions	Disclosure Categories
<del>Assistant Superintendent, Business Services</del>	<del>4</del>
Assistant Superintendent, Educational Services	1
Asst. Superintendent, Human Resources	1
CBOC-Citizen's Bond Oversight Committee	1
<del>Chief of Staff</del>	<del>4</del>
Director, Purchasing	1
Director I, Adult Education	2,3
Director I, College & Career Readiness	2,3
Director I, Human Resources	2,3
Director I, Special Education	2,3
Director I, Student Support Services & Alternative Education	2,3
<del>District Superintendent</del>	<del>4</del>
Executive Director, Communications	2,3
Executive Director, Educational Technology Services	1
Executive Director, Facilities Management	1
<b>Executive Director, Leadership</b>	<b>1</b>
<del>Executive Director, Fiscal Services</del>	<del>4</del>
<del>Governing Board</del>	<del>4</del>
Internal Auditor	1

### Appendix III

Designated Positions	Disclosure Categories
Administrative Coordinators	4,6

Assistant Principals	4,6
Benefit Services Coordinator	2,3
Buyers	3
*Contract Consultants	2,3
Coordinator, Testing & Accountability	2,3
<b>Coordinator, Special Education</b>	<b>2,3</b>
Director, Food Services & Warehouse	2,3
Director, Maintenance & Operations	2,3
Director, Research and Evaluation	2,3
Director, Risk Management	2,3,5
Director, Technical Services	2,3
Director, Transportation	2,3
Director II, Academic Intervention / Alternative Programs	2,3
Director II, Adult Education	4,6
Director II, College and Career Readiness	2,3
<b>Director II, Curriculum Instruction</b>	<b>2,3</b>
Director II, ELL Ed Programs	2,3
Director II, Extended Curricular Programs	2,3
Director II, Instructional Technology	2,3
Director II, Special Education	2,3
Director II, Student Support Services	2,3
Director II, Title 1; Categorical Programs/Grants	2,3
Manager, Fiscal Services	1
Manager, Payroll	2,3
Manager, School Facilities	4,6
Operations Manager, Maintenance & Operations	4,6
Principals	4,6
Project Manager, Planning & Construction	1

\* Contract consultants who make or participate in the making of decisions which may foreseeably have a material effect on the economic interests of the District. Such contract consultants shall disclose pursuant to the disclosure requirements in this code subject to the following limitations:

The Superintendent may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Superintendent'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.

## Disclosure Categories

Individuals holding designated positions must report their interests according to the following corresponding disclosure category(ies) to which their position has been assigned. Please see FPPC Form 700 instructions for more detailed information.

### Disclosure Category 1

Interests in real property located, excluding personal residence, within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by the agency; and investments and business positions in business entities, and income, including loans, gifts (see FPPC Form 700 Schedule D instructions for exceptions), and travel payments, from all sources.

### Disclosure Category 2

Interests in real property, excluding personal residence, located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by the agency.

### Disclosure Category 3

Investments and business positions in business entities, and income, including loans, gifts (see FPPC Form 700 Schedule D instructions for exceptions), and travel payments, from sources, that provide services, supplies, materials, machinery, or equipment of the type utilized by the agency.

### Disclosure Category 4

Investments and business positions in business entities, and income, including loans, gifts (see FPPC Form 700 Schedule D instructions for exceptions), and travel payments, from sources, that provide services, supplies, materials, machinery, or equipment of the type utilized by the department or division to which the filer is assigned duties.

### Disclosure Category 5

Investments and business positions in business entities, and income, including loans, gifts (see FPPC Form 700 Schedule D instructions for exceptions), and travel payments, from sources, that filed a claim against the agency during the previous two years, or have a claim pending.

### Disclosure Category 6

Investments and business positions in business entities, and income, including loans, gifts (see FPPC Form 700 Schedule D instructions for exceptions), and travel payments, from sources, that are of the type to request an entitlement to use agency property or facilities, including, but not limited to:

1. A license

2. Utility permit
3. Station vendor permit.

#### Public Officials Who Manage Public Investments

The following positions are not covered by this conflict of interest code because those individuals holding these positions must file under Government Code Section 87200. These positions are listed for informational purposes only:

- None at time of update

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

Conflict of Interest Code  
Supporting Documents for:  
La Mesa-Spring Valley School District



# LA MESA-SPRING VALLEY SCHOOLS

4750 Date Avenue  
La Mesa, CA 91942  
619 668-5700

[www.lmsvschools.org](http://www.lmsvschools.org)

COSD CLERK OF THE BOARD

2026 JAN 21 PM 2:10

January 21, 2026

Board of Supervisors  
1600 Pacific Highway, Room 402  
San Diego, CA 92101

Dear Members of the Board of Supervisors,

Please see the attached, updated Conflict of Interest Code for the La Mesa-Spring Valley School District for your approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Feliciano'.

David Feliciano  
Superintendent,  
La Mesa-Spring Valley School District

**RESOLUTION ADOPTING A CONFLICT OF INTEREST CODE**

WHEREAS, the Political Reform Act, Government Code 87300-87313, requires each public agency in California, including each school District, to adopt a conflict of interest code;

WHEREAS, a District is permitted to create its conflict of interest code by incorporating by reference the terms of 2 CCR 18730, along with a list of District Officials to whom the code applies and disclosure categories, in accordance with Government Code 87300 and 87306;

WHEREAS, the Governing Board of the La Mesa-Spring Valley School District ("District") has previously adopted a local conflict of interest code in this manner; and

WHEREAS, the District has recently reviewed its list of District Officials, and the duties of each, and has determined that changes to the current conflict of interest code are necessary.

NOW THEREFORE BE IT RESOLVED, the Governing Board of the District adopts the following Conflict of Interest Code, including the accompanying Appendix of District Officials and Disclosure Categories, and

BE IT FURTHER RESOLVED, any earlier resolutions, bylaws, and/or appendices containing the District's conflict of interest code are hereby rescinded and superseded by this Resolution and Appendix.

PASSED AND ADOPTED THIS \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at a meeting, by the following vote:

AYES: \_\_\_\_\_

NOES: \_\_\_\_\_

ABSENT: \_\_\_\_\_

Attest:

Secretary to the  
Board \_\_\_\_\_

**Conflict of Interest Code ("Code") of the La Mesa-Spring Valley School District ("District")**

The Political Reform Act (PRA) (Government Code 81000-87505) requires the District to adopt a conflict of interest code. 2 CCR 18730 contains the terms of a conflict of interest code, which may be amended by the Fair Political Practices Commission (FPPC) to conform to amendments in the PRA. Therefore, the terms of 2 CCR 18730 and any amendments to it duly adopted by the FPPC are hereby incorporated by reference. This Code and the attached Appendix, designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the District.

District Officials, defined as those positions listed herein, shall file a Form 700 (also known as a Statement of Economic Interest) in accordance with the disclosure categories listed in the attached Appendix. [Category 1 and Category 2 District Officials' Form 700 shall be filed with the District's filing officer and/or with the District's code reviewing body utilizing the prescribed filing system. Category 3 District Official's Form 700 shall be filed with the FPPC.](#) The statements shall be available for public review and inspection.

## APPENDIX

### Disclosure Categories

Category 1: A District Official designated "Category 1" shall disclose the following:

- a. Interests in real property located entirely or partly within District boundaries, or within two miles of district boundaries, or of any land owned or used by the district
- b. Investments or business positions in or income from sources which are engaged in the acquisition or disposal of real property within the District, are contractors or subcontractors which are or have been within the past two years engaged in work or services of the type used by the District, or manufacture or sell supplies, books, machinery, or equipment of the type used by the District

Category 2: A District Official designated "Category 2" shall disclose the following:

- a. Investments or business positions in or income from sources which are contractors or subcontractors engaged in work or services of the type used by the department which the designated person manages or directs
- b. Investments or business positions in or income from sources which manufacture or sell supplies, books, machinery, or equipment of the type used by the department which the designated person manages or directs

For a principal in this category, the principal's department is the principal's entire school.

Category 3: (Applicable to positions that "manage public investments," as defined by Government Code 87200): A District Official designated "Category 3" shall disclose, in accordance with Government Code 87200-87210, the following:

- a. Interests in real property located entirely or partly within District boundaries, or within two miles of District boundaries, or of any land owned or used by the District
- b. Investments, business positions, and sources of income, including gifts, loans, and travel payments

### Designated Positions

District Officials	Disclosure Category
Member, Board of Education	1
Superintendent	1
Deputy/Assistant Superintendent	2
Executive Directors	2
Directors	2
Chief Business Officer	<u>3</u>

### Disclosures for Consultants

The Superintendent or designee shall annually determine, on a case-by-case basis, which District consultants, if any, shall constitute District Officials and who shall disclose

financial interests. The Superintendent or designee's written determination shall include a description of the consultant's duties and a statement of the extent of disclosure requirements based upon that description. All such determinations are public records and shall be retained for public inspection along with this conflict of interest code. A consultant is an individual who, pursuant to a contract with the District, makes a governmental decision whether to: (2 CCR 18700.3)

1. Approve a rate, rule, or regulation
2. Adopt or enforce a law
3. Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement
4. Authorize the District to enter into, modify, or renew a contract that requires district approval
5. Grant District approval to a contract that requires district approval and in which the district is a party, or to the specifications for such a contract
6. Grant District approval to a plan, design, report, study, or similar item
7. Adopt or grant District approval of district policies, standards, or guidelines

A consultant is also an individual who, pursuant to a contract with the District, serves in a staff capacity with the District and in that capacity participates in making a governmental decision as defined in 2 CCR 18704 or performs the same or substantially all the same duties for the District that would otherwise be performed by an individual holding a position specified in the District's conflict of interest code. (2 CCR 18700.3)

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Conflict of Interest Code Supporting  
Documents for:  
Lemon Grove School District



COSD CLERK OF THE BOARD  
2026 JAN 16 AM 10:10

January 16, 2026

Clerk of the Board of Supervisors  
Attn: Conflict of Interest Code Update  
1600 Pacific Highway Room 402  
San Diego, CA 92101

RE: Conflict of Interest Code Amendment – November 18, 2025

Dear Clerk of the Board of Supervisors,

At its November 18, 2025, meeting, the Lemon Grove School District's Board of Education approved amendments to our Conflict of Interest (COI) Code. I have attached a copy of the meeting minutes, final COI Code, and redlined COI Code.

Please let me know if you require additional information at [communications@lemongrovesd.net](mailto:communications@lemongrovesd.net)

Sincerely,

Marianna Vinson  
Superintendent/Board Secretary

Attachments:

1. Board Minutes, November 18, 2025
2. Final COI Code Amended, November 18, 2025
3. Redlined COI Code Amended, November 18, 2025

## **Regular Meeting of the Governing Board (Tuesday, November 18, 2025)**

### **Members present**

Dr. Javier Ayala (arrived at 6:25 pm), Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

### **1. OPENING FUNCTIONS**

#### **A. Call to Order**

Meeting was called to order at 5:03 pm

COSD CLERK OF THE BOARD  
2026 JAN 16 AM 10:09

#### **B. Roll Call and Establishment of a Quorum**

A quorum was established

#### **C. Pledge of Allegiance**

#### **D. Approval of Agenda**

Motion to approve

Motion by Jasmin Smith, second by Dorinda Miller.

Final Resolution: Motion Carries

Yea: Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

Not Present at Vote: Dr. Javier Ayala

#### **E. Public Comment: Closed Session Items**

No members of the public addressed the Board

#### **F. Adjourn to Closed Session**

Adjourned to closed session at 5:04 pm

### **2. CLOSED SESSION**

#### **A. Public Employee Discipline/Dismissal/Release (Government Code § 54957, subd. (b)(1))**

#### **B. Personnel Actions (Government Code § 54957)**

Resumed open session at 6:11 pm

### **3. REPORT OF ACTION TAKEN IN CLOSED SESSION**

#### **A. Report of Action Taken in Closed Session**

In the matter of Item 2.A. - By a vote of 4-0, the Board took action in closed session to ratify a settlement agreement and general release between the Governing Board and Executive Director of Human Resources. The agreement was executed on October 28, 2025, and the date of resignation was October 31, 2025.

Motion by Antonio Davis, second by Jasmin Smith.

Final Resolution: Motion Carries

Yea: Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

Not Present at Vote: Dr. Javier Ayala

### **4. OPENING FUNCTIONS (continued)**

#### **A. Recognition: Lemon Grove Academy Elementary School**

Principal Veronica Johnson and Vice Principal Hilary Cuevas reported that staff and students presented their Dia de los Muertos classroom projects. The primary objective was to help students understand and appreciate cultural traditions while exploring universal themes of memory, family, and the celebration of life. Through research, art, and personal reflection, students learned that honoring those who came before us can be both an act of remembrance and an expression of joy.

A special thank-you was extended to the 6th Grade teachers: Ms. Davis, Ms. Cuevas, and Ms. Preciado and to students; Delilah E., German G., Ian R., Lailani P., and Alex M.

#### B. Introduction of New Administrator

Superintendent Marianna Vinson introduced Matt Sheelen as the new Director of the Early Childhood Education Center. Mr. Sheelen brings valuable experience, dedication, and a strong commitment to student success. He joined the meeting to introduce himself, and the Board welcomed him.

#### C. Public Comment: Open Session Agendized Items

Speaker on agenda item 5.D.:

1. Debbie Skipper, Lemon Grove Teachers Association president

#### D. Governing Board Members Correspondence

Correspondences from Board members

#### 5. ACTION ITEMS

##### A. Updated Board Policy and Administrative Regulation 0450: Comprehensive Safety Plan Motion to approve

Motion by Yajaira Preciado, second by Jasmin Smith.

Final Resolution: Motion Carries

Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

##### B. Comprehensive School Safety Plans

Motion to approve

Motion by Dorinda Miller, second by Antonio Davis.

Final Resolution: Motion Carries

Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

##### C. Resolution No. 2025-26-14: Authorizing Revision for Members of the Governing Board Compensation

Motion to approve

Motion by Dorinda Miller, second by Antonio Davis.

Final Resolution: Motion Carries

Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

##### D. Salary Schedule Update: Certificated Management

Motion to approve

Motion by Dorinda Miller, second by Antonio Davis.

Final Resolution: Motion Carries

Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

##### E. Salary Schedule Update: Classified Management

Motion to approve

Motion by Yajaira Preciado, second by Dorinda Miller.

Final Resolution: Motion Carries

Yea: Dr. Javier Ayala, Dorinda Miller, Yajaira Preciado

Abstain: Antonio Davis, Jasmin Smith

##### F. Salary Schedule Update: Deputy Superintendent

Motion to approve

Motion by Dorinda Miller, second by Jasmin Smith.

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

**G. Memorandum of Understanding: Classified School Employee Summer Assistance Program  
Motion to approve**

**Motion by Dr. Javier Ayala, second by Yajaira Preciado.**

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

**H. Updated Board Administrative Regulation 3451.1: Procedures For Handling Money  
Motion to approve**

**Motion by Jasmin Smith, second by Antonio Davis.**

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

**I. Contract Amendment: Ro Health, LLC  
Motion to approve**

**Motion by Dr. Javier Ayala, second by Dorinda Miller.**

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

**J. Updated Board Policy 5116.1: Intradistrict Open Enrollment  
Motion to approve**

**Motion by Jasmin Smith, second by Dr. Javier Ayala.**

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

**K. Updated Board Bylaw and Exhibit 9270 Resolution No. 2025-26-13: Conflict of Interest  
Motion to approve**

**Motion by Antonio Davis, second by Yajaira Preciado.**

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

**L. Authorize Joint-Use Agreement Between the Lemon Grove School District and the County of San Diego for the Lemon Grove Library  
Motion to approve**

**Motion by Dorinda Miller, second by Jasmin Smith.**

**Final Resolution: Motion Carries**

**Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith**

## **6. INFORMATION/DISCUSSION ITEMS**

**A. Unaudited Actuals Oversight Letter: San Diego County Office of Education**

Chief Business Official Tiana Barton shared the Unaudited Actuals Oversight Letter received from the San Diego County Office of Education. She provided an overview of the county's review. The Board was informed of the district's overall fiscal status as reflected in the county's analysis.

**B. Future Board Agenda Items**

**1. 6th Grade Camp Update**

## **7. CONSENT AGENDA**

A. Approval of Consent Agenda

Resolution: Motion to Approve Consent Agenda as Presented Items B - L

Motion by Dorinda Miller, second by Antonio Davis.

Final Resolution: Motion Carries

Yea: Dr. Javier Ayala, Antonio Davis, Dorinda Miller, Yajaira Preciado, Jasmin Smith

B. Minutes for October 21, 2025

C. Personnel Action Report

D. Commercial Warrants

E. Gifts to the District

F. Ratification of Contracts

G. Ratification of Purchase Orders

H. Revolving Cash, Student Body and Cash Clearing

I. Notice of Completion: 2024-2025-01 Roofing Project

J. Notice of Completion: 2024-2025-08 Asphalt Pavement Project

K. Out of State Travel Approval: 2026 National Elementary and Secondary Education Act Conference

L. Notice of Date, Time, and Location of Annual Organizational Meeting

8. CLOSING FUNCTIONS

A. Public Comment: Non-Agendized Items

No members of the public addressed the Board

9. ADJOURNMENT

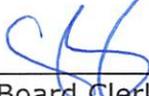
A. Adjourn

Adjourned at 7:34 pm



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Superintendent Marianna Vinson, Board Secretary



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Jasmin Smith, Board Clerk

Exhibit 9270: Conflict Of Interest

Status:  
~~ADOPTED~~DRAFT

Original Adopted Date: 04/28/2018 | Last Revised Date: ~~08/14/2018~~ | Last Reviewed Date: ~~08/14/2018~~Pending

COSD CLERK OF THE BOARD  
2026 JAN 16 AM 10:07

**RESOLUTION ~~2021-22-35~~ 2025-26-13 ADOPTING A  
CONFLICT OF INTEREST CODE**

WHEREAS, the Political Reform Act, Government Code 87300-87313, requires each public agency in California to adopt a conflict of interest code; and

WHEREAS, The Governing Board of the Lemon Grove School District has previously adopted a local conflict of interest code; and

WHEREAS, past and future amendments to the Political Reform Act and implementing regulations may require conforming amendments to be made to the district’s conflict of interest code; and

WHEREAS, a regulation adopted by the Fair Political Practices Commission, 2 CCR 18730, provides that incorporation by reference of the terms of that regulation, along with an agency-specific appendix designating positions and disclosure categories shall constitute the adoption and amendment of a conflict of interest code in conformance with Government Code 87300 and 87306; and

WHEREAS, the Lemon Grove School District has recently reviewed its positions, and the duties of each position, and has determined that (changes/~~no changes~~) to the current conflict of interest code are necessary; and

WHEREAS, any earlier resolutions, bylaws, and/or appendices containing the district’s conflict of interest code shall be rescinded and superseded by this resolution and Appendix; and

NOW THEREFORE BE IT RESOLVED, that the Lemon Grove School District Governing Board adopts the following Conflict of Interest Code, including its Appendix of Designated Employees and Disclosure Categories.

PASSED AND ADOPTED THIS \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at a meeting, by the following vote:

AYES: \_\_\_\_\_ NOES: \_\_\_\_\_ ABSENT: \_\_\_\_\_

Attest:

\_\_\_\_\_  
Secretary/President

Conflict of Interest Code of the  
Lemon Grove School District

The provisions of 2 CCR 18730 and any amendments to it adopted by the Fair Political Practices Commission, together with the attached Appendix specifying designated positions and disclosure categories, are incorporated by reference and shall constitute the district’s conflict of interest code.

Governing Board members and designated employees shall file a Statement of Economic Interest/Form 700 in accordance with the disclosure categories listed in the attached Appendix. The Statement of Economic Interest shall be filed with the district's filing officer and/or, if so required, with the district's code reviewing body. The district's filing officer shall make the statements available for public review and inspection.

## APPENDIX

### Disclosure Categories

Category 1: A person designated Category 1 shall disclose:

- a. Interests in real property located entirely or partly within district boundaries, or within two miles of district boundaries, or of any land owned or used by the district
- b. Investments or business positions in or income from sources which are engaged in the acquisition or disposal of real property within the district, are contractors or subcontractors which are or have been within the past two years engaged in work or services of the type used by the district, or manufacture or sell supplies, books, machinery, or equipment of the type used by the district

Category 2: A person designated Category 2 shall disclose:

- a. Investments or business positions in or income from sources which are contractors or subcontractors engaged in work or services of the type used by the department which the designated person manages or directs
- b. Investments or business positions in or income from sources which manufacture or sell supplies, books, machinery, or equipment of the type used by the department which the designated person manages or directs. For a principal or assistant principal in this category, the principal's department is the principal's entire school at which the principal or assistant principal serves.

### Designated Positions

Governing Board Members 1

District Superintendent 1

Deputy Superintendent 1

Executive Director of Educational Services 1

Chief Business Official 1

Executive Director of Human Resources 1

Executive Director of Special Education and Student Services 1

Director of Nutrition Services 2

Director of Early Childhood Education Center 2

Director of Technology and Network Services 2

Director of Expanded Learning Program 2

~~Manager Facilities Project Director of Maintenance and Operations Services 2~~

Director of Fiscal Services 2

Principal 2

Assistant Principal 2

Community Schools Director 2

### **Disclosures for Consultants**

Consultants are designated employees who must disclose financial interest as determined on a case-by-case basis by the Superintendent or designee. The Superintendent or designee's written determination shall include a description of the consultant's duties and a statement of the extent of disclosure requirements based upon that description. All such determinations are public records and shall be retained for public inspection along with this conflict of interest code.

A consultant is an individual who, pursuant to a contract with the district, makes a governmental decision whether to: (2 CCR 18700.3)

1. Approve a rate, rule, or regulation
2. Adopt or enforce a law
3. Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement
4. Authorize the district to enter into, modify, or renew a contract that requires district approval
5. Grant district approval to a contract that requires district approval and in which the district is a party, or to the specifications for such a contract
6. Grant district approval to a plan, design, report, study, or similar item
7. Adopt or grant district approval of district policies, standards, or guidelines

A consultant is also an individual who, pursuant to a contract with the district, serves in a staff capacity with the district and in that capacity participates in making a governmental decision as defined in 2 CCR 18704, subsections (a) and (b), or performs the same or substantially all the same duties for the district that would otherwise be performed by an individual holding a position specified in the district's conflict of interest code. (2 CCR 18700.3)

Conflict of Interest Code Supporting  
Documents for:  
North County Transit District

**NORTH COUNTY TRANSIT**  
**SAN DIEGO RAILROAD**

COSD CLERK OF THE BOARD  
2026 JAN 26 PM10:20

January 23, 2026

Clerk of the Board  
Board of Supervisors  
County of San Diego  
1600 Pacific Highway, Room 402  
San Diego, CA 92101  
Sent Via Electronic Mail: [form700@sdcounty.ca.gov](mailto:form700@sdcounty.ca.gov)  
(Electronically Transmitted - No hard copy will follow)

Re: Updated NCTD Conflict of Interest Code

To Whom It May Concern:

This is a formal request to update NCTD's Conflict of Interest Code. On January 15, 2026, NCTD's Board of Directors approved the updates to its Conflict of Interest Code to include requirements per Senate Bill 852 that took effect this month.

Enclosed are the following:

1. Conflict of Interest Code – blackline changes
2. Conflict of Interest Code – clean version
3. Approved Staff Report and Resolution No. 26-01 for Conflict of Interest Code, approved by the Board of Directors on January 15, 2026

Please notify me once the County has updated and approved our amendments.

Should you have any questions or need further information, I can be reached at [srodriguez@nctd.org](mailto:srodriguez@nctd.org) or (760) 966-6696.

Sincerely,



Suheil Rodriguez  
Director of Administration

Enclosures

cc: Lori A. Winfree, Deputy Chief Executive Officer/Chief General Counsel, NCTD  
Mary Dover, Chief of Staff, NCTD  
Adrienne Johnson, Deputy Chief People Officer, NCTD

One Community - Advancing Opportunities

# NORTH COUNTY TRANSIT

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## SAN DIEGO RAILROAD

COSD CLERK OF THE BOARD  
2026 JAN 26 AM 10:23

Agenda  
Item #  
**11**

### STAFF REPORT

### ADOPT RESOLUTION NO. 26-01 APPROVING MODIFICATIONS TO BOARD POLICY NO. 8 – CONFLICT OF INTEREST

Time Sensitive:  Consent:

#### STAFF RECOMMENDATION:

Adopt Resolution No. 26-01 approving North County Transit – San Diego Railroad Board Policy No. 8 – *Conflict of Interest*.

#### BACKGROUND INFORMATION:

Pursuant to Board Policy No. 1 - *General Provisions*, "At least annually, staff will review and suggest revisions to existing North County Transit – San Diego Railroad (NCTD) Board of Directors (Board) Policies, as appropriate, and bring new Board Policies, if appropriate, to the Board for consideration and approval."

In October 2025, Governor Newsom signed into law Senate Bill 852 (SB852) amending Section 87500 of the Political Reform Act, which establishes California's campaign finance and disclosure laws for designated public officials via a Statement of Economic Interest, or Form 700. Under SB852, "public officials who manage public investments" on behalf of their agency, must now file their Form 700s with the Fair Political Practices Commission (FPPC) using the FPPC's electronic filing system, rather than with the County of San Diego. SB852 will take effect on January 1, 2026. The positions listed below are subject to the requirements of SB852:

- Board Members and Alternates
- Chief Executive Officer
- Chief Financial Officer
- Financial Consultants

If the Board adopts Resolution No. 26-01, Board Policy No. 8 shall supersede all prior policies previously adopted by the Board and will be effective immediately upon adoption.

Staff recommends that the Board adopt Resolution No. 26-01 approving the modifications to Board Policy No. 8 – *Conflict of Interest*.

#### ATTACHMENT:

11A – Draft Resolution No. 26-01 Approving NCTD Board Policies  
11B – Blacklines of Board Policy No. 8 – *Conflict of Interest*  
11C – Clean version of Board Policy No. 8 – *Conflict of Interest*

#### FISCAL IMPACT:

This staff report has no fiscal impact.

#### STAFF CONTACT:

**Suheil Rodriguez, Director of Administration/Clerk of the Board**  
E-mail: srodriguez@nctd.org Phone: 760-966-6696



**NORTH COUNTY TRANSIT**  
**SAN DIEGO RAILROAD**

COSD CLERK OF THE BOARD  
2026 JAN 26 AM 10:25

**RESOLUTION NO. 26-01**

**RESOLUTION OF THE BOARD OF DIRECTORS OF THE  
NORTH COUNTY TRANSIT – SAN DIEGO RAILROAD APPROVING  
MODIFICATIONS TO BOARD POLICY NO. 8 – CONFLICT OF INTEREST**

**WHEREAS**, the North County Transit – San Diego Railroad (“NCTD”) Board of Directors (“Board”) has adopted Board Policies 1 through 34 to guide the daily operations of NCTD; and

**WHEREAS**, Board Policy No. 1 states that at least annually, the Board will review such Board Policies as previously adopted; and

**WHEREAS**, Due to the implementation of Senate Bill 852 (SB852), effective January 1, 2026, which will require designated public officials to file directly with the Fair Political Practices Commission, modifications to Board Policy No. 8 – *Conflict of Interest* are required; and

**WHEREAS**, the Board has reviewed the proposed modifications to this Board Policy, as listed in Exhibit A to this Resolution and as set forth in full in Exhibit B to this Resolution.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of NCTD hereby approves the revised Board Policy No. 8 – *Conflict of Interest* set forth in full in Exhibit B to this Resolution.

**BE IT FURTHER RESOLVED** that insofar as the provisions of any Ordinance, Resolution, document or previous action of the Board and/or the Chief Executive Officer, prior to the date of this Resolution, are inconsistent with the provisions of this Resolution or the policy adopted by this Resolution, this Resolution and the Board Policy adopted herein shall control.

**PASSED, APPROVED AND ADOPTED** at the Regular Meeting of the Board of Directors of NCTD this 15<sup>th</sup> day of January 2026.

  
BOARD CHAIR

North County Transit – San Diego Railroad

**CERTIFICATION**

I, Suheil Rodriguez, duly appointed and qualified, Clerk of the Board of NCTD, do hereby certify that the above is a true and correct copy of a resolution passed and approved by the Board of Directors of the NCTD adopted at a legally convened meeting of the Board of Directors of the NCTD held on the 15<sup>th</sup> day of January 2026.

  
CLERK OF THE BOARD

North County Transit – San Diego Railroad

**RESOLUTION NO. 25-06**

**RESOLUTION OF THE BOARD OF DIRECTORS OF THE  
NORTH COUNTY TRANSIT – SAN DIEGO RAILROAD APPROVING MODIFICATIONS TO  
BOARD POLICY NO. 8 – *CONFLICT OF INTEREST***

**Exhibit A**

**BLACKLINES MODIFICATIONS**

**Exhibit B**

**MODIFICATIONS TO NCTD BOARD POLICY NO. 8 – *CONFLICT OF INTEREST***

# **NORTH COUNTY TRANSIT**

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## **SAN DIEGO RAILROAD**

COSD CLERK OF THE BOARD  
2026 JAN 26 AM 10:29

### **Board Policy No. 8 Conflict of Interest Code**

#### Summary

This policy establishes the NCTD Conflict of Interest Code pursuant to the Political Reform Act (Government Code § 81000, et seq.).

#### Purpose

The Political Reform Act (Government Code § 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission (“FPPC”) has adopted 2 Cal. Code of Regulations (hereinafter, “Regulation”) § 18730 which 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 FPPC to conform to amendments in the Political Reform Act. Therefore, the terms of Regulation 18730 and any amendments to it duly adopted by the FPPC 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 North County Transit – San Diego Railroad (NCTD).

Government Code § 87306.5 also requires every local government agency to review its Conflict of Interest Code biennially to determine if it is accurate or if the code must be amended. Once the determinations have been made, a notice must be submitted to the code reviewing body pursuant to the biennial review.

All officials set forth in Government Code § 87200 and designated positions shall file their Statement of Economic Interest, also known as the Form 700, with NCTD via the efile web portal managed by the County of San Diego. Digital copies of such statements are maintained by the Clerk of the County of San Diego Board of Supervisors. The Clerk of the Board will make all digital statements and electronic filings available for public inspection and reproduction during regular business hours (Gov. Code § 81008.)

#### Officials Who Manage Public Investments

NCTD officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3(b), are not subject to the NCTD’s Code, but must file disclosure statements under Government Code § 87200, et seq. (Regs. 18730(b)(3)) These positions are listed here for informational purposes only.

## Board Policy No. 8 – Conflict of Interest Code

It has been determined that the positions listed below are officials who manage public investments. (Note: Individuals holding one of the below-listed positions may contact the FPPC 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 87200):

Board Members and Alternates  
Chief Executive Officer/Executive Director  
Chief Financial Officer  
Financial Consultants

In October 2025, Governor Newsom signed into law Senate Bill 852 (SB852) amending Section 87500 of the Political Reform Act, which establishes California’s campaign finance and disclosure laws for designated public officials via a Statement of Economic Interest, or Form 700. Under SB852, “public officials who manage public investments” on behalf of their agency, must now file their Form 700s with the Fair Political Practices Commission (FPPC) using the FPPC’s electronic filing system, rather than with the County of San Diego. SB852 will take effect on January 1, 2026.

### Disclosure Requirements

- A. Public Officials and employees holding positions designated in this Conflict of Interest Code are required to file the initial, annual, and leaving office Statement of Economic Interest for the types of interests in the categories set forth in the applicable Disclosure Categories. It has been determined that these persons make or participate in making decisions, which foreseeably may have a material effect on such financial interests.
- B. Where the Disclosure Category requires disclosure of interests in real property, the designated employee is only required to disclose real property which is located in whole or in part within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by NCTD.
- C. Where the Disclosure Category requires disclosure of investments or sources of income, the designated employee is only required to disclose investments in business entities and sources of income that do business in the jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction within the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction.
- D. Where the Disclosure Category requires disclosure of business positions, the designated employee is only required to disclose positions of director, officer, partner, employee, or any position of management in organizations or enterprises operated for profit.

### Designated Positions Governed by the Conflict of Interest Code

<b>DESIGNATED EMPLOYEES' TITLE OR FUNCTION</b>	<b>DISCLOSURE CATEGORIES ASSIGNED</b>
Accountant (All)	5
Analyst (All)	5
Architect (All)	2, 3, 5

## Board Policy No. 8 – Conflict of Interest Code

<b>DESIGNATED EMPLOYEES' TITLE OR FUNCTION</b>	<b>DISCLOSURE CATEGORIES ASSIGNED</b>
Asset Administrator (All)	5
Chief General Counsel	1, 2, 3, 4
Chief Development Officer	1, 2
Chief Executive Officer	1, 2, 3, 4, 5, 6
Chief Financial Officer	1, 2, 3, 4, 5, 6
Chief Operating Officer	1, 2
Chief People Officer	1, 2
Chief of Staff	1, 2
Contract Officer (All)	1, 2
Controller	1, 2
Deputy Director/Chief (All)	1, 2
Deputy Chief Executive Officer/Chief General Counsel	1, 2, 3, 4, 5, 6
Deputy Chief General Counsel	1, 2, 3, 4
Director (All)	1, 2
Drug & Alcohol Program Administrator	5
Engineer (All)	5
Engineering Technician	5
Executive Assistant/Deputy Clerk	5
Fare Revenue Specialist	4
Human Resources Business Partner (ALL)	5
Human Resources Specialist	5
Labor Relations Specialist	5
Maintenance-of-Way Supervisor	5, 6
Management Analyst (All)	5
Manager (All)	5
Marketing and Communications Associate (All)	5
Operations Supervisor (All)	5
Paralegal	5
Planner (All)	2, 5
Program Manager (All)	5
Project Analyst (All)	5
Project Administrator	5
Project Manager (All)	5
Project Specialist	5
Quality Control Supervisor (All)	5
Rail Technologies (All)	5
Recruiter	5

## Board Policy No. 8 – Conflict of Interest Code

### DESIGNATED EMPLOYEES' TITLE OR FUNCTION

### DISCLOSURE CATEGORIES ASSIGNED

Real Estate Administrator

6

Risk Manager (All)

1, 2, 4

Senior Administrative Assistant/Deputy Clerk

5

Senior Graphic Communications Designer

5

Senior Legal Counsel (All)

1, 2, 3, 4

Senior Right-of-Way Coordinator

6

Staff Attorney (All)

1, 2, 3, 4

System Safety Specialist (All)

5

Telecommunications Engineer

5

Trainer/Instructor (All)

5

Consultants and New Positions

Individuals providing services as a Consultant defined in Regulation 18700.3, or in a new position created since this Code was last approved that makes or participates in making decisions shall disclose pursuant to the broadest disclosure category in this Code subject to the following limitation:

The Chief Executive Officer may determine that due to the range of duties or contractual obligations, it is more appropriate to assign 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 §82019; Regulations 18219 and 18734). The Chief Executive Officer'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 §81008.)

### 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 they are assigned. (Note: This Conflict of Interest Code does not require the reporting of gifts from outside NCTD's jurisdiction if the source does not have some connection with or bearing upon the functions or duties of the



## Board Policy No. 8 – Conflict of Interest Code

DATE	REVISION No.	RESOLUTION No.	COMMENTS
10/18/2012	ADOPTED	12-10	
10/17/2013	1	13-07	2013 REVISION
10/16/2014	2	14-04	2014 REVISION
11/19/2015	3	15-08	2015 REVISION
10/20/2016	4	16-10	2016 REVISION
10/19/2017	5	17-10	2017 REVISION
10/18/2018	6	18-09	2018 REVISION
10/17/2019	7	19-06	2019 REVISION
10/15/2020	8	20-08	2020 REVISION
10/21/2021	9	21-05	2021 REVISION
05/21/2022	10	22-08	2022 REVISION
10/20/2022	11	22-18	2022 REVISION
10/19/2023	12	23-06	2023 REVISION – UPDATE TO POSITION TITLES
06/20/2024	13	24-04	2024 REVISION – UPDATE TO POSITION TITLES
10/17/2024	14	24-08	2024 REVISION – UPDATE TO POSITION TITLES
03/20/2025	15	25-02	2025 REVISIONS – UPDATE TO TITLES, STREAMLINE, AND INCLUDE BUS
10/23/2025	16	25-06	UPDATES TO RETENTION PROCESS FOR DIGITAL FILINGS AND ADDITIONS AND REMOVALS OF POSITIONS SUBJECT TO DISCLOSURE

**Board Policy No. 8 – Conflict of Interest Code**

<u>01/15/2026</u>	<u>17</u>	<u>26-01</u>	<u>ADDITION OF SENATE BILL 852</u> <u>REQUIREMENTS EFFECTIVE</u> <u>JANUARY 1, 2026</u>
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Conflict of Interest Code  
Supporting Documents for:  
San Marcos Unified School District

January 16, 2025

Board of Supervisors  
County of San Diego  
1600 Pacific Highway  
San Diego, CA 92101

Re: Approval of the amended Conflict of Interest Code for San Marcos Unified School District

Dear Supervisors,

San Marcos Unified School District, a public school district in San Marcos, CA, seeks your approval of the recent amendment made to the organization's Conflict of Interest Code. This update includes the filing of Form 700 Statements of Economic Interests from the Director of Curriculum & Instruction, which has been added to the list of Designated Positions.

The amendment to the Conflict of Interest Code was approved by the San Marcos Unified School District Governing Board on January 15, 2026.

Thank you for your time and consideration

Sincerely,



Erin Garcia  
Assistant Superintendent  
Business Services

**RESOLUTION #15-25/26**

**RESOLUTION OF THE GOVERNING BOARD OF THE SAN MARCOS  
UNIFIED SCHOOL DISTRICT AMENDING THE 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. (the “Act”), which contains provisions relating to conflicts of interest which potentially affect all officers, employees and consultants of the San Marcos Unified School District (the “District”) and requires all public agencies to adopt and promulgate a conflict of interest code; and

**WHEREAS**, the Governing Board adopted a Conflict of Interest Code (the “Code”) which was amended on September 08, 2022, 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 Governing Board of, the proposed amended Code was provided each affected designated employee and publicly posted for review at the offices of the District; and

**WHEREAS**, a public meeting was held upon the proposed amended Code at a regular meeting of the Governing Board on September 08, 2022, at which all present were given an opportunity to be heard on the proposed amended Code.

**NOW, THEREFORE, BE IT RESOLVED** by the Governing Board of the San Marcos Unified School District that the Governing Board does hereby adopt the proposed amended Conflict of Interest Code, a copy of which is attached hereto and shall be on file with the Administrative Assistant to the Superintendent and available to the public for inspection and copying during regular business hours;

**BE IT FURTHER RESOLVED** that the said amended Code shall be submitted to the Board of Supervisors of the County of San Diego for approval and said Code shall become effective immediately upon approval by the Board of Supervisors

**BE IT FURTHER RESOLVED** that all previous Conflict of Interest Codes of the San Marcos Unified School District and amendments thereto shall be rescinded as of the effective date of the said proposed Code as approved by the Board of Supervisors.

**APPROVED, SIGNED AND ADOPTED** this 15<sup>th</sup> day of January, 2026.



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President, Governing Board  
San Marcos Unified School District

ATTEST:



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Secretary, Governing Board  
San Marcos Unified School District

# CONFLICT OF INTEREST CODE OF THE SAN MARCOS UNIFIED SCHOOL DISTRICT

(Amended ~~September 08, 2022~~ January 15, 2026)

The Political Reform Act (Gov. Code § 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 Cal. Code of Regs. § 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 Section 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 officials and employees and establishing disclosure categories, shall constitute the conflict of interest code of the San Marcos Unified School District (the "District").

All officials and designated employees required to submit a statement of economic interests shall file their statements with the Administrative Assistant, Business Services, as the District's Filing Officer. The Administrative Assistant, Business Services shall make and retain a copy of all statements filed by Members of the Governing Board and the Superintendent, and forward the originals of such statements to the Clerk of the San Diego County Board of Supervisors. The Administrative Assistant, Business Services shall retain the originals of the statements of all other Designated Employees and make all retained statements available for public inspection and reproduction during regular business hours. (Gov. Code Section 81008)

# APPENDIX

## CONFLICT OF INTEREST CODE OF THE SAN MARCOS UNIFIED SCHOOL DISTRICT

(Amended ~~September 08, 2022~~ January 15, 2026)

### PART "A"

#### OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

District Officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3(b), are NOT subject to the District's Code, but are subject to the disclosure requirements of the Act. (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 Governing Board

Superintendent

~~Financial Consultants~~

Chief Business Official

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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

<u>DESIGNATED EMPLOYEES'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
<del>Assistant Superintendent, Business Services</del>	<del>1, 2</del>
Assistant Superintendent, Human Resources & Development	5
Deputy Superintendent, Educational Services	5
Buyer	4
Buyer, Senior	4
Coordinator, Child Nutrition Services	5
Coordinator, Facilities	5
<del>Director, Curriculum and Instruction</del>	<del>5</del>
Director, Human Resources & Development	5
Director, Kids on Campus	5
Director, Purchasing	4
Director, Risk Management	5,6
Director, Special Programs	5
Director, Student Services	5
Executive Director, Child Nutrition Services	5
Executive Director, Educational Technology	5
Executive Director, Facilities	2,3,5
Executive Director, Finance	4
Executive Director, Leadership and Learning	5
Executive Director, Maintenance & Operations	2, 5
Executive Director, Special Education	5
Executive Director, Transportation	2, 5
Principals (ALL)	5

**DESIGNATED EMPLOYEES'**  
**TITLE OR FUNCTION**

**DISCLOSURE CATEGORIES**  
**ASSIGNED**

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

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<sup>2</sup> Individuals providing services as a Consultant defined in Regulation 18700.3 or in a new position created since this Code was last approved that makes or participates in making decisions shall disclose pursuant to the broadest disclosure category in this Code subject to the following limitation:

The Superintendent may determine that, due to the range of duties or contractual obligations, it is more appropriate to assign 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 § 82019; FPPC Regs 18219 and 18734.) The Superintendent'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 § 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, doing business in, planning to do business in, or have done business during the previous two years in the jurisdiction of the District.

Category 1: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, located in, that 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 or within two (2) miles of any land owned or used by the District, including any leasehold, beneficial or ownership interest or option to acquire property.

Category 3: All investments and business positions in business entities, and sources of income, including 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 and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the District.

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

Category 6: All investments and business positions in business entities, and sources of income, including gifts, loans, and travel payments, if such entities or sources have filed claims against the agency in the past 2 years, or have a claim pending before the District.

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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)