

Attachment A -
Conflict of Interest Code for:
High Tech High

**HIGH TECH HIGH
AMENDED CONFLICT-OF-INTEREST CODE**

COSD ASSESSMENT APPEALS
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The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict-of-interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) that contains the terms of a standard conflict-of-interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict-of-interest code of the **HIGH TECH HIGH ("HTH")**.

Individuals holding designated positions shall file their statements of economic interests with **HTH**, which will make the statements available for public inspection and reproduction. (Gov. Code Sec. 81008.) Upon receipt of the statements for the top officials, e.g., Members of the Board, Alternates, and the Executive Director, **HTH** shall make and retain copies and forward the originals to the **SAN DIEGO COUNTY CLERK OF THE BOARD OF SUPERVISORS**. All other statements will be retained by the **HTH**.

APPENDIX A

DESIGNATED POSITIONS

<u>Designated Position</u>	<u>Assigned Disclosure Category</u>
Members of the Governing Board	1, 2, 3
Associate Director of HTH Teacher Center	1, 2, 3
Athletics and Extracurricular Program Manager	1, 2, 3
Athletics and Wellness Coordinator	1, 2, 3
Benefits Manager	1, 2, 3
Business Manager	1, 2, 3
Business Operations Analyst	1, 2, 3
Chief Executive Officer/President	1, 2, 3
Chief Operations Officer	1, 2, 3
Chief People and Organizational Development Officer	1, 2, 3
Chief Learning Officer	1, 2, 3
Chief Financial Officer/Treasurer	1, 2, 3
Compliance Officer	1, 2, 3
General Counsel	1, 2, 3
Dean	1, 2, 3
Chief of Staff	1, 2, 3
Chief Technology Officer	1, 2, 3
Controller	1, 2, 3
Data Scientist	1, 2, 3
Director, Athletics and Wellness	1, 2, 3
Director of College, Career, and Technical Education (CCTE)	1, 2, 3
Director of Communications and External Affairs	1, 2, 3
Director, Community Engagement & Admissions	1, 2, 3
Director, Credentialing Operations	1, 2, 3
Director, Data Analytics	1, 2, 3
Director, Emerging Bilingual Learning	1, 2, 3
Director, Facilities	1, 2, 3
Director, Food and Nutrition Services	1, 2, 3
Director, Human Resources	1, 2, 3
Director, District Intern & Induction Programs	1, 2, 3
Director of Instructional Leadership and Development	1, 2, 3
Director of Operations	1, 2, 3
Director of General Education	1, 2, 3
Director, Special Education	1, 2, 3
Director of Teacher Center	1, 2, 3

Director, Teacher Credentialing	1, 2, 3
Executive Assistant to the Officers	1, 2, 3
Executive Director, Human Resources	1, 2, 3
Executive Director, College Advising	1, 2, 3
Executive Director, Special Education	1, 2, 3
Expanded Learning Program Manager	1, 2, 3
Food and Nutrition Services Manager	1, 2, 3
Human Resources Generalist	1, 2, 3
Human Resources Manager	1, 2, 3
Manager, Accounts Payable	1, 2, 3
Production Manager	1, 2, 3
Senior Accountant I	1, 2, 3
Senior Accountant II	1, 2, 3
Senior Director, Facilities	1, 2, 3
Senior Manager, Food & Nutrition Services	1, 2, 3
School Director	1, 2, 3
Student Information Systems Administrator	1, 2, 3
Supervisor, Food and Nutrition Services	1, 2, 3
Teacher Center Program Manager	1, 2, 3
Consultants	1, 2, 3
	*

*Consultants are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Chief Executive Officer 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 fully comply 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 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 Section 81008.)

APPENDIX B DISCLOSURE CATEGORIES

Category 1

Designated positions assigned to this category must report:

- a. Interests in real property, which are located in whole or in part within the boundaries (and a two mile radius) of any county in which **HTH** operates.
- b. Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in the acquisition or disposal of real property or are engaged in building construction or design.
- c. Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in, the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by **HTH**.

Category 2

Designated positions assigned to this category must report:

Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by **HTH**, its parents, teachers and students for educational purposes. This includes, but is not limited to, educational supplies, textbooks and items used for extra curricular courses.

Category 3

Designated positions assigned to this category must report:

Investments in income, including gifts, loans, and travel payments, from sources which are engaged in the performance of work or services of the type to be utilized by **HTH**, its parents, teachers and students for educational purposes. This includes, but is not limited to, student services commonly provided in public schools such as speech therapists and counselors.

Conflict of Interest Code for: Metropolitan Transit System

CONFLICT OF INTEREST CODE
OF THE
SAN DIEGO METROPOLITAN TRANSIT SYSTEM

(Amended October 16, 2025)

The Political Reform Act, (Government Code Sections 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulation Section 18730) that contains the terms of a standard model 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 regulation and the attached Appendix designating positions and establishing disclosure categories shall constitute the conflict of interest code of the **San Diego Metropolitan Transit System (MTS)**.

All officials and designated positions shall file their statements of economic interests with MTS's **Executive Assistant/Clerk of the Board** as MTS's Filing Officer. The **Executive Assistant/Clerk of the Board** shall make and retain a copy of all statements filed by Members and Alternates of the Board of Directors, Chief Executive Officer and the Chief Financial Officer, and forward the originals of such statements to the Clerk of the Board of Supervisors of the County of San Diego. The **Executive Assistant/Clerk of the Board** shall retain the originals of the statements filed by all other designated positions. The **Executive Assistant/Clerk of the Board** will 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 DIEGO METROPOLITAN TRANSIT SYSTEM

(Amended October 16, 2025)

PART “A”

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

MTS Officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3, are NOT subject to MTS’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 investments¹:

Board of Directors and Alternates

Chief Executive Officer

Chief Financial Officer

Deputy Chief Financial Officer

Investment Consultant

¹Individuals 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.

LAW OFFICES OF
BEST BEST & KRIEGER LLP

DESIGNATED POSITIONS

GOVERNED BY THE CONFLICT OF INTEREST CODE

<u>DESIGNATED POSITIONS'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Administrative Assistant II – Operations	5
Assistant Manager of Facilities	5
Assistant Manager of Field Operations	5
Assistant Superintendent of LRV Maintenance	5
Assistant Superintendent of Wayside Maintenance	5
Associate Transportation Planner	5
Business Systems Analyst (ALL)	5
Buyer	4
Chief Human Resources Officer	5
Chief Information Officer	5
Chief of Staff	1
Chief Operating Officer – Rail	1
Chief Operating Officer – Transit Services	1
Community Engagement Specialist	5
Contract Administrator (ALL)	4
Contract Operations Administrator	5
Controller	1, 2
Creative Design Manager	5
Deputy Director of Transit – Security & Passenger Safety	5
Deputy General Counsel	1, 2

<u>DESIGNATED POSITIONS'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Director of Capital Projects	1, 2
Director of Contract Services & Passenger Facilities	3, 5
Director of Fare Technology and Operations	5
Director of Financial Planning & Analysis	1, 2
Director of Fleet and Facility Maintenance	5
Director of Human Resources	5
Director of LRV Maintenance	5
Director of Maintenance of Way (MOW)	5
Director of Marketing & Communications	5
Director of Planning & Scheduling	1, 2
Director of Rail Maintenance	5
Director of Rail Transportation	5
Director of Supply Chain & Operations	4
Director of Support Services	5
Director of Transit Security & Passenger Safety	5
Director of Transportation	1
Division Manager of Maintenance (ALL)	5
Environmental Health & Safety Manager	5
Executive Assistant (COO Bus)	5
Facilities Maintenance Supervisor	5
Facilities Supervisor (Bus)	5

DESIGNATED POSITIONS'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

Fare Systems Administrator	5
Financial Analyst (Capital and Grants)	5, 9
Financial Analyst (Operating Budget)	4
Financial Analyst	4
Foreman	5
For-Hire Vehicle Administration Manger	5, 6
General Counsel	1, 2
Grant Analyst	5, 9
Grants Administrator	5, 9
Graphic Designer (ALL)	5
Information Security & Intelligence Engineer	5
Information Security Manager	5
Information Technology Development Manager	5
Information Technology Enterprise Architect (IoT)	5
Information Technology Operations Manager	5
Internal Auditor	4
Learning and Development Manager	5
Liability Claims Supervisor	1, 2
Maintenance of Way (MOW) Contracts and Budget Analyst	5
Manager of Rail Planning and Performance	5, 8

<u>DESIGNATED POSITIONS'</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Manager of Benefits & Compensation	5
Manager of Financial Planning and Analysis	1, 2
Manager of Government Affairs	1
Manager of Human Resources	5
Manager of Inventory Operations	4
Manager of Marketing and Communications	5
Manager of Operations – Transit Security and Passenger Safety	5
Manager of Paratransit & Mini Bus	5
Manager of Planning and Analytics	5
Manager of Planning and Reporting	5
Manager of Procurement	4
Manager of PRONTO and Passenger Support	5
Manager of Real Estate Assets	1, 2
Manager of Risk and Claims	1, 2
Manager of Safety (BUS)	5
Manager of Scheduling	5
Manager of Service Operations	5
Manager of Support Services	2, 3, 5
Manager of Talent Acquisition	5
Manager of Track and Structure	5
Manager of Training (Transportation)	5

DESIGNATED POSITIONS'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

Manager of Transportation Communication and Technology	5
Multimedia Designer	5
Network Engineer III	5
Network Operations Manager	5
Office Support Coordinator	4
Principal Contract Administrator	4
Procurement Specialist (ALL)	4
Professional Standards Manager	7
Project Administrator	5
Project Engineer	1, 2
Project Manager (ALL)	1, 2
Public Relations Specialist	5
Quality Assurance Supervisor	5
Report Development Analyst	5
Revenue Maintenance Supervisor (ALL)	5
Revenue Operations Manager	5
Right of Way Permit Coordinator	2, 5, 6
Right of Way Permit Manager	2, 5, 6
SAP Software Developer	5
Security System Administrator	5
Senior Contract Operations Administrator	5

DESIGNATED POSITIONS'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

Senior Data Warehouse Engineer	5
Senior Human Resources Analyst	5
Senior Project Manager (ALL)	1, 2
Senior Transportation Planner	1, 2
Service Desk Supervisor	5
Software Developer	5
Staff Attorney	1, 2
Superintendent of Facilities	5
Superintendent of LRV Maintenance	5
Superintendent of Wayside Maintenance	5
Supervisor of Maintenance Training	5
Supervisor of Paratransit & Mini Bus	5
Supervisor of Passenger Facilities	5
Technical Project Manager	5
Transit Asset Management Program Manager	2, 4, 9
Transit Store Supervisor	5
Worker's Compensation Analyst (ALL)	7
ZEV and Sustainability Manager	5

DESIGNATED POSITIONS'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

Consultant and New Positions²

²Individuals serving as a Consultant defined in Regulation 18700.3, or in a new position created since this Code was last amended 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 Sec. 82019; FPPC 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 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.³ “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 MTS.

Category 1: All investments, business positions in business entities and sources of income (including receipt of gifts, loans and travel payments). Real property located within the jurisdiction as well as real property within two miles of the real property used by MTS or the potential site.

Category 2: All interests in real property located within the jurisdiction as well as real property within two miles of the real property owned or used by the agency or potential site.

Category 3: All investments, business positions in business entities, and sources of income (including 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 MTS.

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 type purchased or leased by MTS.

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 type purchased or leased by the designated position’s department, unit or division.

Category 6: All investments, business positions in business entities, and sources of income (including receipt of gifts, loans and travel payments) subject to the regulatory, permit, or licensing authority of the designated position’s department, unit or division.

³ 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 of the position. (Reg. 18730.1)

Category 7: All investments, business positions in business entities, and sources of income (including receipt of gifts, loans, and travel payments) if such entities or sources have filed claims against MTS in the past 2 years, or have a claim pending before MTS.

Category 8: Disclose investments and 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 geographical area of, and within two miles of, the designated position's assigned project area.

Category 9: All investments, business positions in business entities, and sources of income, including receipt of gifts, loans and travel payments, or income from a nonprofit or other organization, if the source is of the type to receive grants or other monies from or through MTS or its subdivisions.

Conflict of Interest Code for:

San Diego Association of
Governments (SANDAG)



Conflict of Interest Code

The Political Reform Act, Government Code Sections 81000, et seq., requires SANDAG to adopt and promulgate a Conflict of Interest Code. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendices in which officials, consultants and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of SANDAG.

The persons holding positions listed in the Appendix are designated employees, consultants, or officials. It has been determined that these persons make or participate in the making of decisions that may foreseeably have a material effect on financial interests. Designated persons shall file statements of economic interests with SANDAG when assuming or leaving their position and annually while holding the position. SANDAG will make the statements available for public inspection and reproduction (Gov. Code Section 81008). Statements for all designated employees will be retained by SANDAG and provided to the Code Reviewing Body, the County of San Diego.

**Appendix A
Table 1**

Designated Positions	Disclosure Categories (see Appendix B)
Members, alternates, and/or advisory members of the Board of Directors; and/or Policy Advisory Committees; and/or committees and/or working groups making decisions influencing expenditure of public funds	1, 2, 4
Account Executive (I, II, Associate)	3, 4
Accountant (I, II, Associate, Senior)	3, 4
Administrative Analyst (I, II, Associate, Senior)	3, 4
Administrative Office Specialist	3, 4
AI Architect	1, 2, 4
Borders Program Manager	3, 4
Budget Manager	2, 4
Business Analyst (I, II, Associate, Senior, Principal)	3, 4
Business Services Supervisor	2, 4
Business Services Manager	1, 2, 4
Capital Development Project Manager	1, 3, 4
Capital Program Manager	1, 2, 4
Capital Project Manager (Associate I, Associate II, Senior)	1, 2, 4
Chief of Staff	1, 2, 4
Chief Executive Officer	1, 2, 4
Chief Financial Officer	1, 2, 4
Clerk of the Board (Deputy Clerk)	1, 2, 4
Communications Manager	3, 4
Contracts and Procurement Analyst (I, II, Associate, Senior)	1, 2, 4
Counsel (Legal I, II; Associate Legal; Senior Legal; Deputy General; General)	1, 2, 4
Customer Service Manager	3, 4
Data Scientist (I, II, Associate, Senior, Principal)	3, 4
Deputy Director	1, 2, 4
Deputy Independent Performance Auditor	1, 2, 4

Designated Positions	Disclosure Categories (see Appendix B)
Director (I, II, Senior)	1, 2, 4
Document Processing Specialist III	3, 4
Economic Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Engineer (I, II, Associate, Senior, Principal)	1, 3, 4
Executive Assistant (I, II, Senior)	1, 2, 4
Executive Office Manager	1, 2, 4
Facilities/Maintenance Coordinator	3, 4
Finance Manager	1, 2, 4
Financial Analyst (I, II, Associate)	3, 4
GIS Analyst (I, II, Associate, Senior)	3, 4
Government Relations Analyst (I, II, Associate, Senior)	1, 2, 4
Grants Program Analyst (I, II, Associate, Senior)	1, 2, 4
Grants Program Manager	1, 2, 4
Graphic Designer (I, II, Associate, Senior)	3, 4
Human Resources Analyst (I, II, Associate, Senior, Principal)	3, 4
Human Resources Coordinator	3, 4
Independent Auditor (I, II, Associate, Senior, Principal)	1, 2, 4
Independent Performance Auditor	1, 2, 4
Information Systems Manager	3, 4
Information Systems Analyst (I, II, Associate, Senior)	3, 4
Information Systems Specialist (I, II, III)	3, 4
Landscape Maintenance Supervisor	3, 4
Maintenance and Facilities Supervisor	3, 4
Maintenance Field Technician (Senior)	3, 4
Manager of Business Administration and Operations	1, 2, 4
Manager of Contracts and Procurement Services	1, 2, 4
Manager of Data Science	3, 4
Manager of Financial Programming and Project Control	1, 2, 4

Designated Positions	Disclosure Categories (see Appendix B)
Manager of Governments Relations	1, 2, 4
Manager of Human Resources	1, 2, 4
Manager of Learning and Development	3, 4
Manager of Regional Information Services	3, 4
Manager of Regional Models	3, 4
Manager of Revenue and Project Control	1, 2, 4
Marketing Analyst (I, II, Associate, Senior)	3, 4
Office Services Specialist (II, III)	3, 4
Principal Technology Program Manager	3, 4
Programmer Analyst (I, II, Associate, Senior)	3, 4
Project Coordinator	3, 4
Project Development Program Manager	1, 2, 4
Public Communications Officer (I, II, Associate, Senior)	3, 4
Regional Planner (I, II, Associate, Senior, Principal)	1, 3, 4
Regional Planning Program Manager	1, 3, 4
Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Researcher and Modeler (I, II, Associate, Senior, Principal)	3, 4
Right of Way Agent (Associate, Senior)	1, 2, 4
Senior AI Engineer	1, 2, 4
Senior Budget Program Analyst	2, 4
Senior Financial Programming and Project Control Analyst	1, 2, 4
Software Engineer (I, II, Associate, Senior, Principal)	3, 4
Systems Engineer (I, II, Associate, Senior)	3, 4
Technology Program Analyst (I, II, Associate, Senior)	3, 4
Toll Operations Supervisor	3, 4
TransNet Program Manager	1, 2, 4
UX Designer (Associate, Senior)	3, 4

Pursuant to California Government Code Section 82019, SANDAG consultants who pursuant to a contract with SANDAG, perform the same functions that would otherwise be performed by the persons designated in Table 1 of this document; who manage public investments; who grant agency approval to a contract or to the specifications for such a contract; or who decide whether the policies, standards, or guidelines for SANDAG have been met, also are required to fill out and submit a disclosure of financial interests. Those consultants are required to report in accordance with the disclosure categories shown in Table 2. Consultants will be designated and informed of their obligation to file disclosures whenever any person who, in the opinion of SANDAG, may reasonably be expected to make, participate in making, or in any way attempt to use his/her position as a "consultant" to influence a governmental decision in which the person might reasonably be expected to have a financial interest or perform services that entail the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest.

Table 2

Type of Consultant	Designated Position Title	Disclosure Categories (see Appendix B)
Bond Counsel	Consultant	2, 4
Disclosure Counsel	Consultant	2, 4
Lobbying	Consultant	1, 2, 4
Project Oversight	Consultant	1, 2, 4
Disadvantaged Business Enterprise Advisor	Consultant	2, 4
Labor Compliance Advisor	Consultant	2, 4
Financial Management Advisor	Consultant	1, 2, 4
Auditor	Consultant	1, 2, 4

Public Officials Who Manage Public Investments

The following positions also are listed below because the individuals holding these positions must file under Government Code Section 87200 as they are involved in the investment of public funds. These positions are listed here for informational purposes only:

Table 3

Public Official Description
Members and alternate members of the Board of Directors
Members and alternate members of the Policy Advisory Committees
Members and alternate members of committees or working groups making decisions influencing expenditure of public funds
Executive Director
Chief Deputy Executive Director
General Counsel
Chief Financial Officer
Director of Finance
Financial Management Consultant, Project Managers

Appendix B

When a designated person is required to disclose investment and sources of income, he or she need to disclose investments in business entities and sources of income that do business in SANDAG's jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction in 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. Persons designated in Appendix A shall disclose their financial interests pursuant to the appropriate disclosure categories described in the table below.

Table 4

Disclosure Category	Description
1	Interests in real property 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 SANDAG.
2	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by SANDAG.
3	Investments and business positions in business entities, and income, including loans, gifts,* 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.
4	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that have filed a claim against SANDAG in the previous two years, or have a claim pending.

* Gifts with a value of less than \$50 aggregate per year are not reportable financial interests at SANDAG

Amended January 2010

Amended March 2012

Amended December 2013

Amended March 2015

Amended January 2016

Amended September 2016

Amended March 2018

Amended July 2019

Amended September 2019

Amended June 2020

Amended August 2022

Amended June 2023

Amended January 2024

Amended July 2024

Amended September 2025

Conflict of Interest Code for:

The Classical Academy



THE CLASSICAL ACADEMY, INCORPORATED.

CONFLICT OF INTEREST CODE

Incorporation by Reference of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730)

I. ADOPTION

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, *et seq.*, The Classical Academy, Incorporated hereby adopts this Conflict of Interest Code ("Code"), which shall apply to all governing board members and all other designated employees of The Classical Academy, Incorporated ("Charter School"), as specifically required by California Government Code Section 87300.

II. DEFINITION OF TERMS

As applicable to a California public charter school, the definitions contained in the Political Reform Act of 1974, the regulations of the Fair Political Practices Commission, specifically California Code of Regulations Section 18730, and any amendments or modifications to the Act and regulations are incorporated by reference to this Code.

III. DESIGNATED EMPLOYEES

Employees of this Charter School, including governing board members, who hold positions that involve the making, or participation in the making, of decisions that may foreseeably have a material effect on any financial interest, shall be "designated employees." The designated positions are listed in "Exhibit A" attached to this policy and incorporated by reference herein.

IV. STATEMENT OF ECONOMIC INTERESTS: FILING

Each designated employee, including governing board members, shall file a Statement of Economic Interest ("Statement") at the time and manner prescribed by California Code of Regulations, title 2, section 18730, disclosing reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the employee's position is assigned in "Exhibit A."

An investment, interest in real property or income shall be reportable, if the business entity in which the investment is held, the interest in real property, the business position, or source of income may foreseeably be affected materially by a decision made or participated in by the designated employee by virtue of his or her position. The specific disclosure responsibilities assigned to each position are set forth in "Exhibit B."

Statements Filed With the Charter School. All Statements shall be supplied by the Charter School. All Statements shall be filed with the Charter School. The Charter School's filing official shall make and retain a copy of the Statement and forward the original to the County Board of Supervisors.

V. DISQUALIFICATION

No designated employee shall make, participate in making, or try to use his/her official position to influence any Charter School decision which he/she knows or has reason to know will have a reasonably foreseeable material financial effect, distinguishable from its effect on the public generally, on the official or a member of his or her immediate family.

VI. MANNER OF DISQUALIFICATION

A. Non-Governing Board Member Designated Employees

When a non-Governing Board member designated employee determines that he/she should not make a decision because of a disqualifying interest, he/she should submit a written disclosure of the disqualifying interest to his/her immediate supervisor. The supervisor shall immediately reassign the matter to another employee and shall forward the disclosure notice to the Executive Director, who shall record the employee's disqualification. In the case of a designated employee who is head of an agency, this determination and disclosure shall be made in writing to the Board of Directors.

B. Governing Board Member Designated Employees

The Corporation shall not enter into a contract or transaction in which a director directly or indirectly has a material financial interest (nor shall the Corporation enter into any contract or transaction with any other corporation, firm, association, or other entity in which one or more of the Corporation's directors are directors and have a material financial interest).

EXHIBIT A - Designated Positions

Designated Position	Assigned Disclosure Category
Members of the Governing Board	1, 2
Chief Executive Officer	1, 2
Chief Academic & Innovation Officer	3
Chief Communications Officer	3
Chief Financial Officer	1, 2
Chief Human Resources Officer	3
Chief Information Officer	3
Chief Operations Officer	1, 2
Chief Schools Officer	3
Director of Administration	2
Director of Compliance	2
Director of Facilities	1, 2
Director of Fiscal Services	3
Director of Safety and Security	3
Director of Student Information	3
Director of Student Support Services	3
Director of Technology	3
Principal	3
Assistant Principal	3
Consultants/New Positions	*

* Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitations:

The Chief Executive Officer or their designee 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 disclosure requirements in this section. Such written determination shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief Executive Officer or their designee'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 Section 81008.)

Individuals who perform under contract the identical duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interests in the categories assigned to that designated position.

EXHIBIT B - Disclosure Categories

CATEGORY 1

Persons in this category shall disclose all interest in real property which is located in whole or in part within two (2) miles of any facility utilized by The Classical Academy, Incorporated, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property.

Persons are not required to disclose a residence, such as a home or vacation cabin, used exclusively as a personal residence; however, a residence in which a person rents out a room or for which a person claims a business deduction may be reportable.

CATEGORY 2

Persons in this category shall disclose all investments and business positions in, and sources of income (including gifts, loans and travel payments) that are from, business entities 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 utilized by The Classical Academy, Incorporated.

CATEGORY 3

Persons in this category shall disclose all investments and business positions in, and sources of income (including gifts, loans and travel payments) that are from, business entities 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 utilized by the designated position's department.

Conflict of Interest Code for:

Urban Discovery Academy



COSD CLERK OF THE BOARD
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CONFLICT OF INTEREST CODE OF URBAN DISCOVERY ACADEMY

1. Standard Code of FFPC

The Political Reform Act of 1974 (Government Code 81000 et seq.) requires each state and local government agency to adopt and promulgate a conflict of interest code. As a local government agency, Urban Discovery Academy is therefore required to adopt such a code. The Fair Political Practices Commission ("FFPC") has adopted a regulation (2 Cal. Code of Regs. 18730) which contains the terms of a model conflict of interest code, which can be incorporated by reference as an agency's code. After public notice and hearing, the regulation may be amended by the FFPC to conform to amendments in the Political Reform Act.

2. Adoption of Standard Code of FFPC

The terms of 2 Cal. Code of Regs. 18730 and any future amendments to it duly adopted by the FFPC are hereby adopted and incorporated herein by reference. This regulation and the Appendix attached hereto designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of Urban Discovery Academy. This code shall take effect when approved by the Board of Supervisors for the County of San Diego, and shall thereupon supersede any and all prior codes adopted by Urban Discovery Academy.

3. Filing of Statements of Economic Interest

Pursuant to Section 4 of the model code set forth in 2 Cal. Code of Regs. 18730(b), designated employees set forth in the Appendix shall file statements of economic interests (Form 700) with the Secretary of Urban Discovery Academy. Upon receipt of the statements of the members of the Board of Trustees, the Secretary shall make and retain copies and forward the originals of these statements to the Clerk of the Board of Supervisors for the County of San Diego. Statements for all other designated employees shall be retained by the Secretary.

APPROVED AND ADOPTED by the Board of Trustees of Urban Discovery Academy on the 26th day of March, 2009.


AMENDED by the Board of Trustees of Urban Discovery Academy on the 17th day of August, 2016.

AMENDED by the Board of Trustees of Urban Discovery Academy on the 19th day of September, 2018.

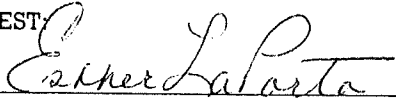
AMENDED by the Board of Trustees of Urban Discovery Academy on the 21st day of October, 2020.

AMENDED by the Board of Trustees of Urban Discovery Academy on the 20th day of July, 2022.

AMENDED by the Board of Trustees of Urban Discovery Academy on the 3rd day of ~~August~~, 2025.
September



President, Urban Discovery Academy

ATTEST: 

Secretary, Urban Discovery Academy

**APPENDIX TO
CONFLICT OF INTEREST CODE OF
URBAN DISCOVERY ACADEMY**

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Preamble

Any person designated in Section I. of this Appendix who is unsure of any right or obligation arising under this code may request a formal opinion or letter of advice from the FPPC or an opinion from Urban Discovery Academy's legal counsel. (Gov. Code 83114; 2 Cal. Code of Regs. 18730(b)(11).) A person who acts in good faith in reliance on an opinion issued to him or her by the FPPC shall not be subject to criminal or civil penalties for so acting, provided that all material facts are stated in the opinion request. (Gov. Code 83114(a).)

Opinions rendered by legal counsel to Urban Discovery Academy do not provide any statutory defense to an alleged violation of conflict of interest statutes or regulations. The prosecuting agency may, but is not required to, consider a requesting party's reliance on such legal counsel's opinion as evidence of good faith. In addition, Urban Discovery Academy may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Urban Discovery Academy may bring against the requesting party under Gov. Code 91003.5.

**I.
Designated Positions**

<u>Designated Employees</u>	<u>Categories Disclosed</u>
Members of the Board of Trustees	1, 2
Superintendent/Chief Executive Officer	1, 2
Principals	3
President	1, 2
Secretary	1, 2
Treasurer	1, 2
Consultants ¹	1, 2

¹With respect to consultants, the President may determine in writing that a particular consultant, although a "designated employee" is hired to perform a range of duties that is limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of the disclosure requirements. The President's determination is a public record and shall be retained for public inspection by Urban Discovery Academy in the same manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

II.

Disclosure Categories

Category 1

Designated positions assigned to this category must report:

All interests in real property which are located in whole or in part within two (2) miles of any facility utilized by an Urban Discovery Academy charter school, including any leasehold, beneficial, or ownership interest or option to acquire such interest in real property. Persons are not required to disclose property used primarily as their residence.

Category 2

Designated positions assigned to this category must report:

All investments and business positions in business entities or sources of income (including gifts, loans, and travel payments) that are from business entities 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 utilized by Urban Discovery Academy.

Category 3

Designated positions assigned to this category must report:

All investments and business positions in business entities or sources of income (including gifts, loans, and travel payments) that are from business entities 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 utilized by the designated position's department. For the purpose of this category, the department of a Principal is his or her entire school.