

**CONFLICT OF INTEREST CODE
OF
GOMPERS PREPARATORY ACADEMY**

1. Standard Code of FPPC

The Political Reform Act of 1974 (Gov. 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, Gompers Preparatory Academy, a California nonprofit public benefit corporation ("Corporation"), is therefore required to adopt such a code. The Fair Political Practices Commission ("FPPC") 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 FPPC to conform to amendments in the Political Reform Act.

2. Adoption of Standard Code of FPPC

The terms of 2 Cal. Code of Regs. §18730 and any future amendments to it duly adopted by the FPPC 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 Corporation. This Code shall take effect when approved by the San Diego County Board of Supervisors, and shall thereupon supersede any and all prior codes adopted by Corporation.

3. Filing of Statements of Economic Interests

Pursuant to Section 4 of the model code set forth in 2 Cal. Code of Regs. §18730(b), each designated board member set forth in the Appendix shall file a Statement of Economic Interests ("Form 700") directly with the Clerk of the Board of Supervisors via the County's online eDisclosure system.

Approved and/or authorized by the Board of Supervisors of the County of San Diego.	
Meeting Date: 10/22/24	Minute Order No. 18
By: 	Date: 10/27/24
Deputy Clerk of the Board Supervisors	

**APPENDIX TO
CONFLICT OF INTEREST CODE OF
GOMPERS PREPARATORY ACADEMY**

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 legal counsel to Gompers Preparatory Academy, a California nonprofit public benefit corporation ("Corporation"). (Gov. Code §83114; 2 Cal. Code of Regs. §18730(b)(1).) 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 Corporation 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, Corporation may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Corporation may bring against the requesting party under Gov. Code §91003.5.

I.

Designated Employees

<u>Designated Employees</u>	<u>Disclosure Categories</u>
Members of the Board of Directors	1 through 3
Superintendent/Director	1 through 3
Other Consultants ¹	--

¹ With respect to consultants, the Superintendent/Director 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 disclosure requirements. The Superintendent/Director's determination is a public record and shall be retained for public inspection by Corporation 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. Reportable Investments

A designated employee in this category shall report all reportable investments, as defined in Government Code § 82034, in business entities located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County, which business entities operate or provide facilities, goods, supplies, equipment and/or machinery, vehicles, personnel or services of a type utilized by the Corporation's charter school.

Category 2. Reportable Interests in Real Property

A designated employee in this category shall disclose all interests in real property, as defined in Government Code §§ 82033, that are within two (2) miles of any facility or real property owned or used by the Corporation's charter school.

Category 3. Reportable Income

A designated employee in this category shall disclose all income as defined in Government Code § 82030 of the designated employee from business entities or other sources located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County, which business entities operate or provide facilities, goods, supplies, equipment and/or machinery, vehicles, personnel or services of a type utilized the Corporation's charter school.