

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).

Approved and/or authorized by the Board of Supervisors of the County of San Diego.	
Meeting Date: 10/16/25	Minute Order No. 21
By: [Signature]	Date: 10/16/25
Deputy Clerk of the Board Supervisors	

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

DESIGNATED POSITIONS'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

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

DESIGNATED POSITIONS'
TITLE OR FUNCTION

DISCLOSURE CATEGORIES
ASSIGNED

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.