

Attachment A –  
Conflict of Interest Code for:  
Element Education

**Conflict of Interest**

**Subject: Conflict of Interest**

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

**Last Revision Date: 09/26/2025**

**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, Director of Student Services, Director of Advancement and Public Affairs	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 for :  
Grossmont Union High School District

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

COSD CLERK OF THE BOARD  
2026 JAN 20AM12:41

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 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
Assistant Superintendent, Business Services	1
District Superintendent	1
Executive Director, Fiscal Services	1
Governing Board	1

#### Appendix II

Designated Positions	Disclosure Categories
Assistant Superintendent, Educational Services	1
Assistant Superintendent, Human Resources	1
CBOC-Citizen's Bond Oversight Committee	1
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 and Family Engagement, Learning and Innovation	2, 3
Director I, Student Support Services & Alternative Education	2,3
Executive Director, Communications	2,3
Executive Director, Educational Technology Services	1
Executive Director, Facilities Management	1
Executive Director, Leadership	1
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	
Coordinator, Special Education	2,3	
Director, Food Services & Warehouse	2,3	
Director, Maintenance & Operations	2,3	
Director, Risk Management and Compliance	2,3,5	
Director, Technical Services	2,3	
Director, Transportation	2,3	
Director II, Accountability, State and Federal Programs	2,3	
Director II, Adult Education	4,6	
Director II, College and Career Readiness	2,3	
Director II, Curriculum Instruction	2,3	
Director II, ELL Ed Programs	2,3	
Director II, Extended Curricular Programs	2,3	
Director II/Principal, Home Choice	2,3	
Director II, Special Education	2,3	
Director II, Student Support Services	2,3	
Manager, Fiscal Services	1	
Manager, Payroll	2,3	
Manager, School Facilities	4,6	
Operations Manager, Maintenance & Operations	4,6	
Principals	4,6	
Senior 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 for:  
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 13th day of January, 2026 at a meeting, by the following vote:

AYES: 05

NOES: 00

ABSENT: 00

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. The 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 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	3

### **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 for:  
Lemon Grove School District**

**RESOLUTION 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) 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 18th day of November, 2025 at a meeting, by the following vote:

AYES: 5 NOES: 0 ABSENT: 0

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 department is the 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

Facilities Project Director 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 for:  
North County Transit District

## **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 e-file 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

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<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

Real Estate Administrator  
Risk Manager (All)  
Senior Administrative Assistant/Deputy Clerk  
Senior Graphic Communications Designer  
Senior Legal Counsel (All)  
Senior Right-of-Way Coordinator  
Staff Attorney (All)  
System Safety Specialist (All)  
Telecommunications Engineer  
Trainer/Instructor (All)  
Consultants and New Positions

### DISCLOSURE CATEGORIES ASSIGNED

6  
1, 2, 4  
5  
5  
1, 2, 3, 4  
6  
1, 2, 3, 4  
5  
5  
5

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

position. (Reg.18730.1.)

Category 1: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are located in, do business in, or own real property within the jurisdiction of NCTD.

Category 2: All interests in real property which is located in whole or in part within, or not more than two miles outside the jurisdiction of NCTD.

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 NCTD.

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 NCTD.

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, subject to the regulatory, permit, or licensing authority of the Designated Position's department, unit or division.

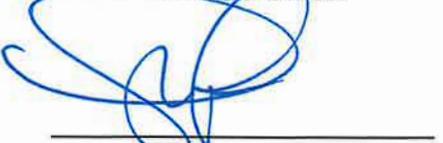
### Approvals

  
Board Chair

Date

  
Chief Executive Officer

1-20-26  
Date

  
Deputy Chief Executive  
Officer/Chief General Counsel

1-20-2026  
Date

## 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**

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

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

**(Amended 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 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

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>
Assistant Superintendent, Human Resources & Development	5
Deputy Superintendent, Educational Services	5
Buyer	4
Buyer, Senior	4
Coordinator, Child Nutrition Services	5
Coordinator, Facilities	5
Director, Curriculum and Instruction	5
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)