

**CONFLICT OF INTEREST CODE  
OF  
STEELE CANYON HIGH SCHOOL**

1. Standard Code of FPPC

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, Steele Canyon High School 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. § 8730 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 Steele Canyon High School. 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 Steele Canyon High School.

3. Filing of Statements of Economic Interests

Designated employees shall file Statements of Economic Interests with the agency, which will make the statements available for public inspection and reproduction (Gov. Code Section 81008).

Upon receipt of Statements from the Directors/Agency Head/Board Members listed below, the agency shall make and retain a copy and forward the original of this/these statement(s) to the County of San Diego Clerk of the Board of Supervisors.

- CEO/Principal, Steele Canyon High School
- Members of the Board of Directors

The original statements for all other designated employees will be retained by the agency.

APPROVED AND ADOPTED by the Board of Directors of Steele Canyon High School on the 14th day of February 2024.

Myra Giordano  
Myra Giordano, Board Chair  
Steele Canyon High School

ATTEST: Vicki Ordway  
Vicki Ordway, Board Secretary  
Steele Canyon High School

Approved by The Governing  
Board of Steele Canyon HS  
On 2/14/2024 By (initials)

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|---------------------------------------------------------------------------------------|----------------------------|
| Approved and/or authorized by the<br>Board of Supervisors of the County of San Diego. |                            |
| Meeting Date: <u>4/9/24</u>                                                           | Minute Order No. <u>15</u> |
| By: <u>(signature)</u>                                                                | Date: <u>4/12/24</u>       |
| Deputy Clerk of the Board Supervisors                                                 |                            |

**APPENDIX TO  
CONFLICT OF INTEREST CODE OF  
STEELE CANYON HIGH SCHOOL**

**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 Steele Canyon High School' General 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 General Counsel 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 General Counsel's opinion as evidence of good faith. In addition, Steele Canyon High School may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Steele Canyon High School may bring against the requesting party under Gov. Code § 91003.5.

**I.**

**Designated Employees**

| <u>Designated Employees</u>              | <u>Categories Disclosed</u> |
|------------------------------------------|-----------------------------|
| Members of the Board of Directors        | All                         |
| CEO/Principal, Steele Canyon High School | All                         |
| Business Manager                         | All                         |
| Facility Manager                         | All                         |
| Human Resources Manager                  | All                         |
| Office Manager                           | All                         |
| Technology Manager                       | All                         |
| General Counsel                          | All                         |
| Consultants <sup>1</sup>                 | --                          |

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<sup>1</sup> With 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 disclosure requirements. The President's determination is a public record and shall be retained for public inspection by Steele Canyon Charter High School in the same

## **II.**

### **Disclosure Categories**

#### **Category 1. All-Inclusive Reportable Investments**

A designated employee in this category shall report all reportable investments, as defined in Gov. 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 operate or provide any of the following:

- Accounting or auditing services
- Banks and savings and loans
- Computer hardware or software, or computer services or consultants
- Communications equipment or services
- Educational services, supplies and materials
- Entities or persons who have filed claims against Steele Canyon Charter High School or have claims pending against Steele Canyon Charter High School
- Insurance brokers and agencies
- Insurance adjusting, claims auditing or administration, or underwriting services
- Office equipment or supplies
- Personnel and employment companies and services
- Printing or reproduction services, publications, and distribution
- Securities, investment or financial services companies
- Title insurance and escrow

#### **Category 2. Reportable Interests in Real Property**

A designated employee in this category shall disclose all interests in real property, as defined in Gov. Code §§ 82033 and 82035, that is

(a) within or not more than two (2) miles outside the boundaries of San Diego County that has situated on it any business entity named in category no. 1 above; or

(b) within two (2) miles of any facility or real property owned or used by Steele Canyon Charter High 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 the below-listed 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 during the reporting period.

- Accounting or auditing services

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manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

Banks and savings and loans  
Computer hardware or software, or computer services or consultants  
Communications equipment or services  
Educational services, supplies and materials  
Entities or persons who have filed claims against Steele Canyon Charter High School or have claims pending against Steele Canyon Charter High School  
Insurance brokers and agencies  
Insurance adjusting, claims auditing or administration, or underwriting services  
Office equipment or supplies  
Personnel and employment companies and services  
Printing or reproduction services, publications, and distribution  
Securities, investment or financial services companies  
Title insurance and escrow

**Category 4. Less-Inclusive Reportable Investments**

A designated employee in this category shall disclose only investments as defined in Gov. Code § 82034 in any business entity, which within the last two years has contracted with or in the future foreseeably may contract with Steele Canyon Charter High School to provide personnel, services, supplies, material, machinery or equipment:

(a) to Steele Canyon Charter High School, of the type utilized by Steele Canyon Charter High School which is located in or doing business in San Diego County, and associated with the job assignment or position of the designated employee; or

(b) to any entity which has contracted with Steele Canyon Charter High School within the last two years or which in the future foreseeably may contract with Steele Canyon Charter High School to provide services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

**Category 5. Less-Inclusive Reportable Income**

A designated employee in this category shall disclose only that reportable income as defined in Gov. Code § 82030 which is derived from a source which within the last two years has contracted with Steele Canyon Charter High School or in the future foreseeably may contract with Steele Canyon Charter High School to provide personnel, services, supplies, materials, machinery or equipment:

(a) to Steele Canyon Charter High School, of the type utilized by Steele Canyon Charter High School which is located in or doing business in San Diego County, and associated with the job assignment or position of the designated employee; or

(b) to any entity which has contracted with the Steele Canyon Charter High School within the last two years or which in the future foreseeably may contract with Steele Canyon Charter High School to provide personnel, services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

**Category 6. Business Positions**

A designated employee in this category shall disclose by completing Form 700, Schedule "C." A designated employee shall list:

(a) the name and address of each business entity in which he or she is a director, officer, partner, trustee, employee, or in which he or she holds any position of management;

(b) a description of the business activity in which the business entity is engaged; and

(c) the designated employee's position with the business entity.

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AMENDED 02/14/2024